



## Most Common Mistakes When Serving Private School Students

Presented by Michelle Doyle for Catapult Learning



## Programs Covered—Equitable Participation

- Title IA: Education for the Disadvantaged
- Title IB: Reading First (not funded)
- Title IC: Migrant Education
- Title IIA: Teacher Quality
- Title IID: Technology Education



## Covered Programs (cont.)

- Title III: English Language Acquisition
- Title IVA: Safe and Drug-Free Schools
- Title IVB: 21<sup>st</sup> Century Community Learning Centers
- Title V: Innovative Programs
  
- Also...IDEA requires equitable services



## ED Monitoring

- Student Achievement and School Accountability “monitors” states approximately every 3 years
- Chooses several LEAs within the state being monitored
- ED monitors Title I, but lessons learned can apply to all programs



## Most Common Mistakes

1. Conducting the consultation process
2. Providing equitable services
3. Determining educational need
4. Staffing the private school program
5. Benefiting the private school



## Most Common Mistakes

6. Evaluating the program
7. Maintaining control of the program
8. Establishing a complaint procedure
9. Monitoring by the SEA



## 1. Consultation

- Failure to conduct timely and meaningful consultation with private school representatives
  - Not timely for on time start of services
  - Meeting notice not timely
  - Information only—not discussion
  - Decisions have already been made
  - Unilateral offer of LEA program



## Not Just Instructional Program

- Title I consultation also must occur on:
  - Parental involvement program
  - Professional development activities
  - Other instructional set asides
- Same rules hold: not unilateral offer, not just p.s. program, timely start, allow for meaningful participation in designing



## Consultation in all Programs

- Same topics must be covered
- Opportunity for discussion
- Program design based on needs of students being served



## Avoiding Mistakes in Conducting Consultation

- Set up a timeline with private school representatives
- Plan for multiple meetings and input from private school representatives
- Have an agenda and get input ahead of time



## Avoiding Consultation Mistakes

- Keep written notes and share with private school representatives
- Use a checklist to ensure all required topics are covered
- Utilize a meaningful “written assurance” for Title I, consider for other programs



## 2. Equitable Share of Funds

- Title I: Districts do not consider extrapolation to count low-income children
- Title I: Failure to use proportion of low-income children to calculate:
  - Instructional funds
  - Professional development
  - Parental involvement
  - Share of funds from district-wide instructional programs
  - Allocation of carryover funds



## Other Equitability Issues

- Programs must be conducted for the full school year—failure to begin on time
- Districts obligate *all* funds, including those generated by private school students
- Provisions must be made for substitute teachers for direct service programs
- Computers and other equipment on which the program depends must be fully operational



## Avoiding Mistakes in Providing Equitable Services

- Title I: Use the proportion of low-income children in determining set aside portions for the private school program
- Make all aspects of funding topics for consultation—be above board
- Ensure programs meet needs of private school participants



### 3. Determining Educational Need: Title I

- Monitoring visits found:
  - No written criteria developed in consultation
  - Single measures being used (i.e. test scores)
  - Criteria not educationally related (i.e. poverty)
  - Participating students not residing in Title I attendance areas
  - Private school officials choosing students to receive services



### Educational Need—Other Programs

- Requiring unnecessary paperwork
- Putting responsibility for program administration on private schools
- Requiring the same method or criteria for determining educational need
- Not designing programs to meet educational needs of private school students



## Avoiding Mistakes in Determining Educational Need—Title I

- Make developing criteria for determining educational need part of consultation process
- Ensure multiple, age appropriate, educationally-related measures are used
- Clearly communicate to private school officials that their role is to help rate educationally needy students; LEA's role is to select participants that are most educationally needy



## Avoiding Mistakes in Education Need—other programs

- Take responsibility for program administration
- Require only ESEA-needed paperwork
- Use needs of private school students as foundation for program design
- Make determination of need part of consultation process



## 4. Staffing Private School Program

- Many private school Title I programs being staffed exclusively with paraprofessionals
  - Paraprofessionals not under direct and immediate supervision of highly qualified teacher
  - Paraprofessionals determining program of services



## Avoiding Mistakes with Paraprofessionals

- Ensure those providing private school services are qualified—all programs
- For Title I, if there are paraprofessionals, ensure they are supervised and working in close proximity to HQT



## 5. Benefits to Private School—Title I

- Title I program must primarily benefit participating Title I students
  - Must reside in Title I attendance areas
  - No whole-class instruction or team teaching
  - Cannot test all students for eligibility
  - Supplement and add value; cannot supplant
  - PD must be targeted to helping teachers better teacher at risk students; not general PD



## Benefits to Private School

- All programs should primarily benefit eligible students, not private school
- Professional development should be to enhance student learning, not improve school
- General aid to private school not permissible



## Avoiding Providing Private School Benefits

- Closely supervise the inclusion of students in the program—Retain control of choosing participants from list of educationally needy
- Ensure private school officials understand program rules and regulations
- Focus on student needs when designing and implementing programs



## 6. Evaluate the Program

- Monitors consistently find most Title I programs only evaluate the students
- Programs should show progress for participants, positive effects in classroom
- Few programs determine benchmarks for success: essential for all programs



## Avoiding Program Evaluation Mistakes—Title I

- To evaluate the program
  - Determine benchmarks for success in consultation
  - Review results of assessments in consultation
  - Use results to modify the program for future
- Assessment instrument should be effective measure of group progress toward meeting benchmarks—determined in consultation



## Avoiding Evaluation Mistakes

- Determine evaluation method during consultation
- Ensure evaluation is not intrusive to private school program
- Limit paperwork and administration by private school—public school program



## 7. Maintaining Control of Program

- Balance: views of private school officials and final decision by LEA
- All aspects: administration, funding, design, development, implementation
- Failure to:
  - Provide oversight and ensure LEA makes decisions
  - Control use of purchased materials
  - Determine hiring of teachers and other personnel
  - Supervise third party
  - Supervise Title I personnel



## Not the Private School's Program

- Findings:
  - Private school staff in control of requisition
  - Materials not labeled as Title I program
  - Materials not exclusively for Title I participants
  - Program design responsibility given to private school officials
  - Program evaluation responsibility given to private school officials



## Avoiding Mistakes in Program Control

- Conduct clear and compliant consultation sessions—delineate responsibilities
- Visit programs frequently, keep dialogue open with private school representatives
- Supervise Title I teachers or third party provider



## 8. Complaint Procedure

- Failure of SEAs to establish complaint procedure
- Failure to inform private school representatives of complaint procedure
- Failure of SEAs to ensure LEAs establish complaint procedures
- Failure to construct online application to allow for adequate oversight



## Avoiding Complaint Procedure Mistakes

- As an LEA, have a complaint procedure that was written in consultation with private school officials
- As an SEA, ensure LEAs have complaint procedures and have clear SEA procedure
- Provide copies of the complaint procedure to private school officials and on website



## 9. Failure of SEA to Monitor

- SEA's role is to ensure compliance by LEAs
- Includes ensuring equitable participation of private school students
- Technical assistance to LEAs is part of SEA's responsibilities
- Con app (including online) must allow for monitoring in all aspects
- Identify and correct in timely manner



## Other SEA Issues

- Late determination of available funds
- Committee of Practitioners private school representative
- Inadequate monitoring and compliant procedures = inability of SEA to ensure equitable services
- Specific responsibility in IDEA to ensure equitable participation



## Avoiding SEA Oversight Mistakes

- Establish clear, approved procedures on the state level for working with LEAs
- Ensure LEAs are aware of their responsibilities—no surprises
- LEAs be aware of responsibilities and requirements for equitably serving private school students, teachers, and parents
- Document, document, document



## U.S. Department of Education Resources

- Title I Services to Private School Students (non-regulatory guidance):  
<http://www.ed.gov/programs/titleiparta/psguidance.doc>
- Title IX Guidance: Equitable Services to Private Schools (non-regulatory guidance):  
<http://www2.ed.gov/policy/elsec/guid/equitableserguidance.doc>



Thank you!