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ABSTRACT

This document is part of a kit entitled Title I in your community, which has been redesigned to include new information about Title I and to disseminate the experiences of parent groups who have been working on Title I problems. This kit includes sample forms which can be used by parent and community groups to monitor the use of Title I funds. The contents of this document include: (1) How Title I works; (2) Federal guidelines and criteria; money for poor children, not general aid, use of funds to supplant, the comparability rule, construction and equipment, failure to meet the needs of educationally disadvantaged children, supportive services, and private schools; (3) Title I in a unitary school system; (4) Your rights to public information; (5) Analyzing information, interviewing officials, and visiting schools; (6) Parent councils; (7) Community action; and, (8) Compensatory education and other Federal programs. Appendix A lists the names, phone numbers, and jurisdictions of Federal and State officials involved with Title I. Appendix B is a partial list of people and organizations that may be of help on Title I and related issues, with address and phone number specified.

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TITLE I IN YOUR COMMUNITY

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INTRODUCTION

Title I of the Elementary and Secondary Education Act of 1965 provides financial assistance to school districts where there are large numbers of children from poor families. Title I represents the largest amount of Federal aid to education, and it is the first Federal education program to concentrate exclusively on the needs of poor children.

Because Title I can mean extra resources to help meet the needs of poor and minority children, it is very important that this money be spent legally and in the most effective way so that poor children actually benefit from these funds.

Title I has not always provided the benefits and opportunities for better education that had been expected when the legislation was passed in 1965. The program was implemented on a crash basis and in the first few years, school districts had few guidelines on how to spend the money. Most spent it in any way they wished without regard to the needs of poor children. Many financially hard-pressed school districts have simply spent the money on the needs of the entire system or a group of schools, or have spent Title I funds on services for poor children that other children in the system were already getting out of the regular budget. Federal regulations for the involvement of poor parents in Title I programs have gradually developed since the Act was passed, but these regulations have been ignored or violated in most school systems.

While there has been a great deal of misuse of funds, there has also been an increasing demand by alert individuals and community organizations that Title I funds be spent on the most pressing educational needs of children and that there be genuine parental involvement. Parents in districts in all parts of the country have begun to monitor the use of funds, to establish parent councils, to file complaints with the Department of Health, Education, and Welfare, and to file lawsuits in Federal Courts.

This Kit, Title I in Your Community, has been redesigned to include new information about Title I and to share with you the experiences of parent groups who have been working on Title I problems. This kit is designed to assist parents, community groups, and other interested citizens in understanding Title I and in organizing to insure effective compensatory programs for educationally disadvantaged children.

The Legal Defense Fund and other organizations which are listed in Appendix B are ready to assist you with Title I issues or problems in your community. In our continuing effort to insure that Title I is administered in the best interests of poor and minority children, information concerning violations of Title I as well as promising educational programs in school districts across the country would be of enormous assistance to us. If you have information or questions to send us, or if you want a copy of the Kit, please write to the Legal Defense Fund's Washington Office:

Legal Defense Fund
1028 Connecticut Avenue, N.W.
Suite 510
Washington, D.C. 20036
(202) 833-1898

Our policy on charging for the Kit is as follows:

single copies (up to 10)	\$1.50 each
multiple copies	1.00 each
copies free to individuals and organizations who are unable to pay.	

This money helps us with the costs of mailing the Kit to you and contributes to our printing bill.

I. HOW TITLE I WORKS

Title I of the Elementary and Secondary Education Act of 1965 provides financial assistance to school systems which have high concentrations of low-income children residing within the district. This Act is entirely Federally financed and requires no matching grant. Approximately 16,000 out of a total of 26,983 school districts in the Nation receive Title I money.

Payments under Title I go to state departments of education which in turn make payments to local school districts. Local districts are eligible under the law to receive a certain amount established by formula upon submitting a project application. Local school officials may use the money for a broad range of projects, but the expenditures must be in conformity with the law, the Regulations, and certain Program Criteria established by the U.S. Commissioner of Education. The project application of a local school system must set forth (1) the program or programs to be supported, (2) a budget, (3) the number of eligible children, (4) designated target areas, (5) an identification of the needs of eligible children, (6) provisions for evaluating the programs or projects, and (7) specific plans for involving parents in the program and making Title I information available to the public. The state department of education is responsible for approving, rejecting, or renegotiating the project applications from local districts. These project applications do not go to Washington. The State is entirely responsible for approving project applications, paying funds, monitoring, auditing, and evaluating the effectiveness of projects.

Who Is Eligible?

Children of families with incomes of less than \$3,000, including welfare payments, who are "educationally disadvantaged" are eligible to receive Title I benefits. Some children who are educationally disadvantaged, but who are not from poor families, can also benefit from Title I. "Educationally disadvantaged" usually means behind in grade level or not reaching the educational level appropriate for a child's age.

Schools are eligible for Title I programs if they have a very high concentration (higher than the district-wide average) of Title I eligible children. These schools are called "target schools." What happens when there are no high concentrations of children from low-income families in certain schools is discussed on page 9.

Each school district in the country which has at least 10 poor children gets some amount of Title money based on a formula. The formula is figured this way. The number of children in the district from families with annual incomes of \$2,000 or less is added to the number of children from families receiving AFDC payments, plus the number of

children in institutions for the neglected and delinquent. This total number of children is then multiplied by half the state per-pupil expenditure or by half the national per-pupil expenditure, whichever is the greater amount.

II. FEDERAL GUIDELINES AND CRITERIA

Before you begin your examination of your local Title I program, you should know what the Federal Guidelines and requirements for spending Title I funds are and what some of the common misuses and violations of the law are that have been found in other communities.

Money for Poor Children, Not General Aid

The purpose of Title I is to help poor children who are educationally disadvantaged and to enable local districts to provide educational assistance to these children that they would not otherwise receive. Accordingly, Title I funds must be spent only on eligible children.

Too many school districts use Title I as general aid for the entire school district. This is a violation of the law.

General aid is perhaps the easiest violation of all to detect and it usually occurs in one of the following ways:

1. Aid to all schools. A school district uses Title I as general aid if it furnishes supplies, personnel or services to all schools and students in the system whether or not they are qualified for Title I assistance. One of the most frequent kinds of general aid is the use of Title I funds to support an audio-visual center, a film library, closed-circuit T.V., a curriculum-materials center which serves all schools. If Title I pays the salary of a nurse, curriculum coordinator, or supervisor who serves children in Title I and non-Title I schools, this is another example of general aid.
2. Aid to non-target schools. In some cases Title I money does not reach educationally disadvantaged children at all but is spent in schools which are not even eligible to receive the money.
3. Failure to concentrate funds. Federal Regulations and Program Criteria require that Title I funds be concentrated on a limited number of children most in need of assistance and that the Title I program be of "sufficient size, scope, and quality" to provide reasonable promise of substantial progress. Title I money must go to target areas and schools with high concentrations of poor children. This is determined by calculating the average number of poor children in the district and selecting as target schools those school attendance areas which have a higher than the district-wide average of poor children. Within target schools, the eligible children most in need of assistance should then be identified. Children in target schools who are not poor but who are "educationally disadvantaged" may participate in Title I.

Each target child should be receiving a variety of services, all of which should be designed to meet his individual educational needs. The amount spent per child in the Title I program is a good indication of concentration. The federal government requires that the amount spent per child should be about one-half the total expenditure from state and local funds for the regular school program. Thus, if a school district's per-pupil expenditure is \$600, the district should be spending approximately \$300 per child in the Title I program.

Use of Funds to Supplant

Title I funds are supposed to be used in addition to, not instead of, state and local funds. This means that school districts must not decrease the amount of money they are spending, or would have spent, in Title I eligible schools just because they are receiving Title I funds for students in certain schools. If Title I money is spent in place of state and local funds, this is called supplanting.

Supplanting can occur in three ways:

1. Equalizing poor schools with other schools. The most obvious kind of supplanting is using Title I money at eligible schools for the same items funded by local or state money at other schools. For example: A school district has a special reading program in every elementary school. The school system's own budget pays for the program in non-poor schools, but Title I pays for it in poor schools.

2. Assuming the funding of programs previously supported by state and local funds. Sometimes local school systems use Title I money to support programs and services which existed in Title I schools before the beginning of Title I and which were paid for out of other funds. For example, a nurse, teacher, or curriculum coordinator may have been assigned to one or several Title I schools. She may have been in these schools for several years, but now her salary shows up in the Title I budget. Personnel assigned to more than one school may be serving Title I eligible children as well as non-Title I children, but both parts of her salary are paid out of Title I funds.

3. Using Title I money instead of other available funds. In order to be more effective, Title I money should be coordinated with other federal funds. School districts that are eligible for other federal programs should make use of them, leaving Title I money free to be spent on other educational needs. For example, it is legal to use Title I funds to provide breakfast or lunch for poor children, but there are other Federal sources, such as the National School Lunch Program and federal commodities, which are specifically designed to provide free and reduced priced meals. Therefore, if at all possible these sources should be utilized and Title I funds freed for instructional or other programs. Funds specifically earmarked by Congress for free lunches have been returned by some states to the federal government.

The Comparability Rule

In order to prevent supplanting, the Office of Education now requires school districts which receive Title I funds to show that Title I schools are equal to non-Title I schools. This is known as the comparability requirement. "Comparability" is just another word for equal. If Title I schools are equal to, or comparable to, non-Title I schools, then Title I services for poor children should be in addition to the educational program for everyone.

What information must your school district have to show that it is in compliance with the comparability rule? The following information is required for each Title I school compared with the same data averaged for all the non-Title I schools for each grade group:

1. the average number of assigned, certified teachers;
2. the average number of assigned, certified other instructional staff (such as a special reading teacher);
3. the average number of assigned, non-certified instructional staff (such as teacher aides, or un-certified teachers);
4. the amounts expended for instructional salaries;
5. the amount included in expenses for instructional salaries, but not including "longevity pay." Longevity pay is that amount of a teacher's salary which is paid because of years of experience and service;
6. Expenses for other instructional costs, such as textbooks, library books, audio-visual materials, and other teaching supplies;
7. average daily membership for each school;
8. any other information which the state may want to ask.

How does a state Title I office determine whether your school district is in compliance with the comparability requirement? Each district must submit this information with its 1971-72 Project Application. The state reviews the comparability information. A school district will be the considered in compliance with comparability if ratios and expenditures for each Title I school are within five percent (5%) of those averages for the non-Title I schools. If a district is not in compliance with this requirement, the law says that the school district has until July 1, 1972 to make its Title I schools equal to all the non-Title I schools.

In addition to submitting this comparability information, each local school district must also submit:

- a. A factual description of the services provided with funds from state and local sources at both its Title I and non-Title I schools that are similar to those which it proposes to support with Title I funds.

- b. Either a statement that none of the services to be supported with Title I funds have in the past been supported by funds from state or local sources, or such information as the state education agency may require in order to determine that the local educational agency is maintaining its prior level of effort at the Title I schools.

State Title I officials will probably accept at face value the assurance of local officials that no Title I funds are supplanting state or local funds, or that the Title I activities have not been supported in past years by local and state funds. But you should not accept this assurance provided in the Project Application. You can determine for yourself if Title I funds are supplanting state and local funds by:

1. finding out whether programs or services, like those provided with Title I funds, are operating in non-Title I schools in your district;
2. talking with teachers and Title I staff members to determine if they are doing the same job now that they were doing before they came under the Title I program.

One last important point to remember about the comparability rule is that the federal guidelines do not require school districts to count "longevity pay" in determining whether poor schools are equal to other schools in the district. Longevity pay is that part of a teacher's salary which is paid because of length of service or years of experience. Leaving out longevity pay will not show a true comparison between the Title I and non-Title I schools, but at least for now, that is the federal rule. Some states are requiring local school systems to report the longevity pay anyway, so you may find it on the comparability report which your district submits.

Construction and Equipment

The use of any Title I money for construction and equipment must specifically be connected with the Title I program. Even then, local districts are not allowed to build any permanent fixtures with Title I money unless they can prove that they cannot afford such buildings. In order to save most of the money for direct educational purposes, federal officials and some state officials discourage the use of Title I for construction, purchasing of mobile units, and stocking huge amounts of equipment. However, many districts have used Title I funds to stock up on large amounts of educational equipment and instructional materials which are not directly related to any Title I program. In addition, school districts have used Title I money to construct or rent facilities which were not related to the purpose of ongoing Title I programs.

Failure to Meet the Needs of Educationally Disadvantaged Children

The chief purpose of Title I is to raise academic achievement for "educationally disadvantaged" children--those children with specific educational problems such as low reading levels, inability to speak English, need for greater individual attention, or need for instruction which deals directly with their cultural background.

Too many local school districts use Title I funds for purposes which have little to do with raising academic achievement or improving educational opportunities. Instead, they spend the money to purchase large amounts of unnecessary equipment, to add to the administrative staff, or to provide services which educationally disadvantaged children do not need. As a result, in many school districts very little Title I money is spent on the educational needs of eligible children. Moreover, the program may be so poorly designed that it does little to correct educational deficiencies.

Supportive Services

Supportive services are a vital part of a child's education, and such services can be paid for out of Title I funds. Supportive services usually consist of clothing, medical and dental attention, and various school fees. Where parents are charged for textbooks, workbooks, course fees, and fees for field trips, these charges should be paid for out of Title I funds for Title I eligible children. School lunches, breakfasts, or snacks are also considered a supportive service, but because there are other federal programs which support these programs, it is not necessary for a school district to spend Title I funds on child nutrition.

Since free and reduced price school lunches are subsidized by the Department of Agriculture through the National School Lunch Program, you should make sure that all Title I eligible children are receiving free or reduced price lunches. The principal of your school should have a copy of the free and reduced price lunch policy, an application form, and the nationally determined income guidelines, and this information should have been distributed to every parent. If the principal does not have this information, check with your superintendent, or in a large system, with the school lunch director.

Without adequate clothing, children do not get to school. Realizing this problem, welfare mothers and other concerned Title I parents have conducted clothing campaigns in recent months aimed at getting local and state school officials to approve funds in the Title I application for the clothing needs of Title I eligible children. In some cities, these drives have been successful, and Title I children are getting winter coats and shoes and other such necessities. How the clothing program is administered is up to your local group and the local school officials, but you should have a voice in determining the need for clothing and then determining who shall get it and how.

The Office of Education has issued policies regarding expenditures for supportive services and clothing. They are summarized here.

In general, the Office of Education says, proposals for supportive services such as health, welfare, nutrition, and recreation should be fully justified on the basis that the resources of other agencies (like welfare) are unable to meet the need for these services. Medical, dental, or clothing needs should also be justified on the basis of the fact that these services are a high priority need for the Title I children to be served. (Program Guide 44.3.1)

Title I may provide clothing under the following conditions:

1. clothing is part of the total Title I program;
2. only Title I participating children are eligible to receive clothing;
3. clothing is necessary for school attendance;
4. all other resources, such as welfare payments, have been exhausted;
5. monitoring procedures are established to determine whether eligible children actually receive the benefits to which they are entitled;
6. no direct payments are made to a child or parent;
7. a fixed rate cannot be established; individual needs for clothing must be established for each child.
(Program Guide 60)

Private Schools

Eligible children who live in eligible target areas but attend private schools may receive Title I assistance. Federal Regulations provide that these children must be included in services and programs funded by Title I. School officials must show in the Project Application that private school children have been included. However, equipment purchased with Title I funds may not be permanently located on private school property, nor can it be used by other than eligible children. Private school teachers may not be paid out of Title I funds.

Private segregation academies in the South should not have any students eligible to participate in Title I and should not be permitted to participate in Title I activities in any way.

III. TITLE I IN A UNITARY SCHOOL SYSTEM

In recent years, school systems, especially in the South, have been changing to a unitary system. A unitary school system means that different schools for whites and blacks have been abolished, and a single, or unitary system, is established in which all children attend racially desegregated schools. Poor children no longer attend one or a few schools but are enrolled in several schools through out the system.

Title I poses special problems in a unitary school system. The first major problem is how to identify the attendance areas, or target areas, in which Title I programs and services ought to be concentrated. A second serious problem is how can Title I eligible children be provided with special compensatory and remedial education in a class which contains only some Title I children without isolating or segregating them from their classmates. Can Title I eligible children who formerly participated in the program, but who now attend school in an ineligible attendance area still receive Title I services? Can special classes for Title I children be established? What happens to equipment and material at a former target school?

Selection of Target Areas

When a school district converts to a unitary system, it must establish new target areas for Title I purposes. Schools eligible for Title I are determined on the number or percentage of children from low-income families actually attending school. Only those schools, or target areas, which have higher than the district-wide average of poor children, are eligible for Title I. If poor children are so spread out throughout the schools that there is no school in which there is a "high concentration" of poor children, or if all schools have roughly the same number and percentage of poor children, then target areas, as traditionally defined, cannot be established. In this case, children can be selected for participation in the program on the basis of greatest need. Title I resources should be concentrated on those children who are most in need of special assistance. (Program Guide 44.4.2)

The purpose of the target area requirement is to help in identifying eligible children who are to be considered for participation in Title I activities on the basis of educational deficiency and need for special services. (Program Guide 44.1.1) Thus, if there are no target areas, other means of identifying children who will participate in Title I must be found.

In school districts with no wide variations in the concentrations of poor children, a whole school district or group of contiguous schools may be regarded as a single area of high concentration. In this case the local school authorities must make a special effort to insure that Title I services are concentrated sufficiently on a limited number of children to insure an effective program. (Program Guide 64)

Serving Individual Children

If Title I children are to benefit from extra services, the Title I program should be of sufficient size, scope, and quality to give a reasonable promise of success. However, the program should not be conducted in a manner that isolates or segregates Title I children from their non-Title I classmates. Many Title I services, such as counseling, tutoring, and supportive services, can be provided along with classroom instruction. If special remedial assistance, for example classes with a specially trained reading teacher, is to be provided during class time, a Title I child could be removed from his regular class for a certain period of time for special instruction. He would return to his regular classroom.

Federal policies give no guidance on how to serve Title I children in a mixed school, nor on how long a Title I child could be separated from his regular class for special services. However, a helpful guide in determining how Title I children can be served is found in the California Title I Guidelines (1971 Revision):

Disadvantaged children learn by their association with children who bring to the school situation a background of experiences different from their own. Attention should be given to the 'hidden curriculum' by which the child learns from himself and from his association with others, such as peers, teachers, and administrators. Title I projects will not be approved if they (1) create special tracks for the educationally disadvantaged; (2) establish adjustment, pregrade, or junior grade classes for the educationally disadvantaged; or (3) isolate Title I children from the mainstream of school life for a period of time greater than one-half of the regular school day.

Title I Children in Ineligible Attendance Areas

Some children who have previously participated in Title I because they have been served on the basis that services "follow the child" will no longer be eligible for Title I services, according to federal policies. (Program Guide 64, January 21, 1971.)

This is a most unfortunate federal policy because it denies Title I to eligible children if they choose to transfer to another school. The "follow the child" rule does not apply as much in a unitary system or in a system in which there are no well defined attendance areas. But in school systems which are not unitary, or in which children are largely segregated on the basis of race or neighborhood, children who transfer on their own would lose their right to participate in Title I. Rights to free and reduced price lunches should not be effected by any transfer. However, if poor children are transferred by the school district to another school (that is where there is no choice involved in the move), parents

should argue that the school district has a responsibility to continue Title I services for participating children since the school district has made the change in schools mandatory.

Equipment and Materials

Equipment and materials at a former target school should be re-distributed along with Title I children to new schools. The problem is that it is very difficult, if not impossible, to prevent this equipment from becoming used as general aid for all students. School systems in the past have bought so much equipment and materials with Title I funds that many teachers and principals hardly know what to do with it. The problem is compounded in a unitary system. School officials cannot insure that only Title I children use film projectors, television sets, tape recorders, gym equipment or mobile units. On the other hand, it would be a waste of resources to keep the equipment locked up in a room because no one knows how it can be legally used.

Teachers and principals should determine which equipment can genuinely be used in the Title I program, and the excess equipment could be sold to the school district for general use. Title I equipment which is located at a formerly target-area school, can remain at that school even though it is no longer a target school, if the equipment continues to be used for the same purposes (i.e. a compensatory educational program). (Program Guide 24.)

IV. YOUR RIGHT TO PUBLIC INFORMATION

Title I documents are public and you have a legal right to obtain copies. The Congress of the United States has said so. The Office of Education has said so. Some state Title I offices have cooperated in making Title I documents public and free. Despite the law, school officials in many parts of the country continue to deny Title I project applications, lists of Title I participants, and other pertinent Title I information to poor parents or interested citizens.

Getting information from your superintendent on how Title I funds are now spent is absolutely vital if parents are to determine if the funds are being used legally and effectively to meet the needs of poor children. If you have this problem in your school district, here is what you can do about it.

Public Law 91-230 (the 1970 amendments to the Elementary and Secondary Education Act) passed by Congress on April 13, 1970, specifically says that Title I applications and other "pertinent documents" are public information. The Office of Education issued a policy statement in October, 1970 requiring that state and local education agencies make all Title I documents available for inspection, or upon request "at a reasonable charge" provide an interested party with a copy of the document. Title I regulations on public information are included in this Kit.

When you approach your superintendent or Title I coordinator, have clearly in mind the specific documents you want. These are the most important ones to ask for:

1. the Title I Project Application for the current school year;
2. the Title I Project Application for the summer program;
3. the Title I Project Application for any past school years that you wish;
4. all amendments to the current Project Application;
5. the Title I budget and list of Title I personnel for the current school year;
6. Any evaluations or audits of the Title I program;
7. a list of the members of the Parent Advisory Council (Be sure to ask this question even if you know that there never has been such a council);

8. Title I equipment inventory.

Once you have laid out exactly what you want, school officials should discuss with you when copies could be made available. Stress that you want copies of this information rather than just permission to look at it in the office. If school authorities refuse to make any of this information available, remind them of the federal law and regulations on the subject. If you continue to be denied the right to these documents, you should file an immediate complaint with the state Title I coordinator and with the Title I office in Washington. (Let the Legal Defense Fund know too; we might be able to help.)

Points to Remember

1. You do not have a right to any documents relating to the performance of specific Title I children or Title I teachers.
2. Under present federal policies, local and state officials may charge you for copying materials. The federal policy speaks of a "reasonable charge." That typically means 5 cents a page, the actual cost of xeroxing. The Legal Defense Fund and other organizations have urged the Office of Education, without success, to rule that copies of Title I documents should be made available free of charge, especially to parents of Title I eligible children. We recommend that you take the same position with local and state officials.
3. Members of the Title I parent council must be provided Title I documents free of charge.
4. You have a right to draft proposals and planning documents which relate to future Title I plans and programs.
5. You have a right to a list of children currently participating in Title I programs.
6. Your school district must include in its project application specific plans for making Title I information available.

Obtaining Information from the State Title I Office

All the information you need to establish how Title I money has been spent in your local district should be available from local officials. You should not have to go to the state level to obtain basic information. However, discussions with state officials will provide information on how the state administers the program, what requirements it make of local systems, and how well the state monitors, audits, and evaluates Title I programs at the local level. In the Appendix to this manual you will find the name and telephone number of your state Title I coordinator. Call him for an appointment after you have as much information as you can get about how the Title I program operates locally. Ask to see the man who actually make decisions, rather than one of his assistants.

What should you ask at the state Title I office? Generally, your questions will be framed by what you have already found out locally. But you should have clearly in mind why you are going to the state. There are three main reasons for visiting the state Title I office.

1. To get more information or to check the information you have already.
2. To file a complaint or protest about illegal uses of Title I money in your local district which you feel you have proven as well as you can.
3. To obtain information which local officials refused to give you.

The comments in this section will be devoted to the first purpose. Comments concerning the second purpose will be found in the chapter on Community Action.

Since you already know a good deal about Title I in your school district, you will probably want to ask specific questions. If you find questionable uses of Title I funds, you ought to ask why the state office approved such projects. You should get some notion about how carefully Title I project proposals are approved. It may be that this process is so inadequate that you may wish to add it to the complaint which you may be formulating.

Other areas which you should probe include:

1. Has the state established a procedure for implementing the new requirement for a mandatory Parent Council? Is the procedure adequate? Does it establish a timetable for compliance? What instructions has the state given to local districts about how to choose council members? Are parents involved in decisions affecting the method of choosing council members?
2. How many times and when has the state audited your local districts? Will it perform an audit when charges are made that funds are being misused? Will it supply audit reports to members of the community?
3. Has the state evaluated the effectiveness of the Title I program in your district? Who gets the evaluation? Is it public information?
4. What steps has the state taken to correct misuse of funds (if that happened) in your district?
5. By what criteria does the state approve of requests to use Title I funds for equipment and construction?

V. ANALYZING INFORMATION, INTERVIEWING OFFICIALS, AND VISITING SCHOOLS

Gathering and analyzing information about Title I expenditures is not difficult, but it is essential to documenting facts and planning any kind of community action.

You have two basic jobs in analyzing this information. The first is to find out where the money is going and what kinds of programs and services are being supported. The second is to determine if the school district is actually providing the services and programs to eligible children as they say they are in the Project Application. It is possible that the programs listed in the application are not actually operating in the schools; so it is wise not to take the Project Application at face value until you have checked the information in it by visits to schools and interviews with school officials.

There are five basic steps to understanding how Title I funds are used in a local district:

1. Determine where the money is going. Begin with the budget and the figures provided in the Title I Project Application.
 - a. Figure it out by category--administration, instruction, health, food service, equipment, maintenance and operation of plant. These items are listed under Section II.9 of the standard federal "Application for Grant to Meet the Special Educational Needs of Educationally Deprived Children."
 - b. How many and what kind of personnel are paid by Title I funds? To which schools are they assigned? You will find this in Section II. 10, Project Staff.
 - c. What equipment is to be purchased? Look in the Budget section. Each school district should have an inventory of Title I purchased equipment which cost more than \$100. If the Application includes purchases for the current year, a list should be attached. You should also obtain equipment inventories for past years. When reviewing the equipment inventories, check for relevancy of equipment to the Title I program or the educational needs of children, extravagant purchases, and location of equipment.
 - d. What construction, remodeling, or renting or mobile units is to be supported?
 - e. Look under maintenance and operation of plant for such expenditures as drivers, janitors, utilities, repair of equipment, and minor remodeling of facilities.

f. Under the transportation category, try to determine its purpose and whether it is related to Title I activities or the needs of poor children.

g. Under the category of food services, health services, and attendance and community services, you should determine from the Application what personnel have been hired, and in your interviews you should find out exactly what services are provided for which children.

h. Make sure you have all the amendments to the budget and Project Application. School officials frequently change the program and the budget after submitting the Project Application.

i. Do you have the Project Application for the summer program?

2. Next, figure out which schools and which students are receiving Title I assistance. The schools with the greatest number of children from low-income families in the district will be listed, not necessarily all schools in the system. Only the schools with a higher than average percentage of low-income children should be included in the program.

8 ELIGIBLE ATTENDANCE AREAS, LOCATION OF ACTIVITIES, AND NUMBER OF CHILDREN EXPECTED TO PARTICIPATE AT SCHOOLS WHERE TITLE I ACTIVITIES WILL BE LOCATED

A PUBLIC SCHOOLS SERVING CHILDREN IN ELIGIBLE ATTENDANCE AREAS AND OTHER PUBLIC SCHOOLS WHERE TITLE I ACTIVITIES WILL BE LOCATED								
NAME OF PUBLIC SCHOOL (LIST IN RANK ORDER PER COL. 4 OR COL. 5)	TOTAL NUMBER OF CHILDREN ENROLLED IN EACH SCHOOL LISTED IN COL. (1)	NUMBER OF CHILDREN RESIDING IN ATTENDANCE AREAS			ESTIMATED NUMBER OF CHILDREN WHO WILL PARTICIPATE IN ACTIVITIES AT SCHOOLS LISTED IN COLUMN (1)			
		TOTAL	FROM LOW- INCOME FAMILIES	PER- CENT (COLS. 4 ÷ 3)	FROM PUBLIC SCHOOLS	FROM PRIVATE SCHOOLS	TOTAL (COLS. 6+7)	NUMBER IN COL. (8) FROM OUT- SIDE OF PROJECT AREA
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
X Elementary School	175	200	150	75%) These are the only schools) above the average; thus,) they are the only schools) that can be target schools			
Y Elementary School	700	700	350	50%				
A Elementary School	525	300	100	33%				
B Elementary School	1000	800	200	25%				
Total	1900	2000	800	40%) this is district-wide average			

Is the number of children enrolled in the Title I schools and the total number of participants in the Title I program the same? Title I participants are listed in Section II. 12. Many Project Applications simply list the entire school enrollment as the number of participants rather than identifying individual children who are educationally disadvantaged. Even in a Title I target school all children may not qualify under the law as either meeting the poverty criteria or the standard of educational deprivation set by local school officials. If all students in the target schools are participating, this may be an indication that Title I money is being used as general aid.

On the other hand, it could well be that all children in the school or in the school district are eligible for assistance. The problem then is to determine whether those children most in need or those with the most severe educational needs have been identified and assisted with Title I programs. By dividing the total amount of funds approved by the state by the total number of participants, you will have the average amount of Title I money spent on each participant. This figure may vary from school to school, or from program to program because some students may get more services than other students. However, the average figure will give you some rough idea of how thinly the funds may be spread.

ESEA TITLE I - 1 (3-68)

**APPLICATION FOR GRANT
TO MEET THE SPECIAL EDUCATIONAL NEEDS OF EDUCATIONALLY DEPRIVED CHILDREN
under Title I of Public Law 89-10 as amended**

SECTION I - PROJECT REVIEW AND APPROVAL (To be completed by State Educational Agency)							
1. STATE CODE	2. STATE PROJECT NO.	3. APPLICANT CODE NO.	4. APPLICANT PROJECT NO.	5. COUNTY CODE	6. CONG. DISTRICT	7. SMSA CLASS	8. TOTAL ALLOCATION \$
							9. TOTAL AMOUNT REQUESTED \$
SIGNATURE (Authorized SEA Official)				DATE APPROVED	FOR FISCAL YEAR ENDING June 30, 1969		10. TOTAL AMOUNT APPROVED \$

3. From the budget and program description you should determine what programs and services are operating in each school. This will be set out in the description of programs, and the assignment of teachers to schools may also be included. If you can get this school-by-school information from the materials you have, list for each school the programs and services which Title I supports. Check this information through interviews with teachers and principals and conversations with children and parents. If this information is not provided, you will have to dig it out from interviewing the local Title I coordinator, the principals, and the teachers.

4. Once you determine how Title I funds are being used in target schools and what kinds of programs and services Title I eligible children are provided, you will want to find out whether these same services and programs are provided to other children in the system with local, state or other kinds of federal money. If, for example, Title I is supporting a remedial reading program or an experimental mathe-

matics course, are those programs provided in other schools which are not receiving Title I assistance? The only way you can determine this is to visit other schools in the system and talk to principals, teachers, the PTA officials and similar persons who are familiar with that school. If you find the same programs or services, equipment or construction in non-Title I schools as in Title I schools but paid out of different budgets, you probably have a case of using Title I funds to supplant state and local funds.

5. Check for general aid. Obviously, if money is being used to support services and programs that reach ineligible children, eligible children are being cheated. There may be instances, however, when to prevent ineligible children from participating in Title I services when they are in the same class as eligible children simply would not make good sense. For example, if Title I is supporting a reading clinic or a special excursion, other children in a class or in a school may benefit without considering that a case of misuse of Title I funds, if their participation does not dilute in any way the services rendered to eligible children.

In most curriculum and materials centers where there is equipment bought with Title I money, equipment is checked out by teachers or by individual schools. A visit to the center and an examination of the check-out chart should tell you where the equipment and materials are going.

There are other kinds of important information you should have to understand fully how Title I operates:

1. Has the school district established a Parent Council? Who is on it? Has the school system really involved the parent council in decision-making or has it simply used it as a rubber stamp?

2. Has the school district an affirmative information program for parents and the Parent Council which accurately describes the programs to be funded, provides an easy-to-understand budget, and guarantees open access to information?

3. Has the school district conducted any evaluations of the Title I program as required? Are these evaluations designed simply to make the district look good, or do they make an honest attempt to evaluate whether children are learning or whether the goals of the program are being met.

4. Are the goals of the Title I program clear and specific, or doesn't the program have any goals at all? Are the program goals stated in such vague and general terms as to be almost meaningless? (School officials may use large words in order to throw parents off. Try to get "true definitions" of terms.) Are the goals stated in terms of educational progress or are they stated in other terms such as improving discipline or achieving middle-class values or broad unexplained terms such as "cultural enrichment"? Are the goals based on racist implications or ideology? If definite and specific goals are stated, is the program funded by Title I directed at those goals in any way? You may need to consult educational experts or authorities on these matters, but quite often simple common sense will tell you whether the goals of the program are directed to meet any clear objectives at all.

5. Above all, is the Title I program designed to meet the most pressing and obvious educational needs of poor children? In a district where poor and minority children are three years behind in reading, is Title I supporting remedial reading or is it supporting trips to an amusement park or an arts and craft program? In a district with poor Spanish-speaking children is Title I money being used to meet language needs or are these needs being ignored? Does the language program give equal weight to Spanish as it does to English or is it simply an effort to erase any Spanish language, tradition, or culture?

6. How does the school lunch program operate in your district? Does the district participate in the National School Lunch Program? (You can find this out from local officials or from the state school lunch director.) Under this program, are free and reduced-price lunches provided in poverty-area schools or does Title I support food service in those schools? Does Title I money pay the reduced price? In general you should watch out for cases where Title I funds may be used to support a lunch program where the National School Lunch Program, surplus commodities, and a little local effort could be used to support the school lunch program and thus free Title I for other uses.

7. It is crucial to your investigation to determine how local school officials decide which children are eligible for Title I assistance. Are the poverty criteria used to rank eligible schools the most recent welfare figures? How is educational deprivation determined? How are the needs of eligible children defined? Is there any attempt to determine educational deprivation or is it simply equated with poverty? What test or other criteria is employed? If little or no attempt is made to determine educational deprivation and the district doesn't understand the problem, how can a Title I program be designed and conducted to deal with educational deprivation?

8. What information has the school system sent to the state on the comparability of each Title I school and the average of all the non-Title I schools? If your district has submitted a plan for comparability is the plan a good one that calls for real changes that will bring poor schools up to par with all other schools?

9. If your school system has recently desegregated, is Title I being used effectively to serve eligible children or is it being misused to segregate or discriminate against poor children?

In finding answers to the questions raised in number 3, 4, 5, and 7, a careful reading of the program description prepared by the local district may be helpful. It is usual for school officials to include in this section their reasons for selecting the programs they are conducting, the goals they have set forth and whether there is a real effort to measure progress of students and thus show the worth of their programs. Included in this kit are two interviews which may be helpful in discussions with the Title I coordinator of the district and with principals and teachers. Such interviews should be conducted after the documents have been examined and when you think you have some notion of how the money is spent. Talking directly with school officials may clear up many questions and raise more than you had in the first place.

Finally, it is important to remember that not all children eligible under the law may receive assistance. Because Congress has never fully funded Title I, there simply is not enough money coming into each local district to give each eligible child all the services he needs. The choice is between giving a little to everyone or all to some children who are most deprived. That is a very difficult choice to make. Therefore, you cannot argue that a local district did not provide Title I benefits to some eligible children unless you can show that they are the most deprived in terms of the meaning of the statute, regulations, and program criteria. Because local districts are beginning to concentrate Title I funds, some children who received Title I benefits in the past no longer will get them. This causes great dissatisfaction in the community, but school officials are acting properly under the law in concentrating Title I assistance.

Interviews and School Visits

Visit your school district office to get the Project Application. Make an appointment to return to interview the Title I Coordinator. In anticipation of your school visits, you should also try to arrange in advance to have interviews with school principals and/or other personnel associated with the Title I program. Be sure to reserve plenty of uninterrupted time. (Twenty minutes or an hour with constant interruptions will not do.)

After you get the Project Application and other information, take it home; study and analyze all the data in preparation for your interview with the Title I Coordinator.

Your interviewing techniques will determine to a large extent how much information you will obtain.

As a guide for your interviews, two sample interviews are included in the Community Kit - one for the Title I Coordinator and one for school principals or other personnel connected with the Title I program. Here are some suggestions to make your interviews as productive and informative as possible:

1. Be prepared. Before you go for the interview, know as much as possible about Title I and how it operates in your own school district.
2. Be cool. Carry along a notebook and keep an attentive, interested attitude. This is likely to encourage school officials to be more informative.
3. Press for full and complete answers to your questions. Don't hesitate to repeat the question until you feel you have a satisfactory answer.
4. If you suspect that the person whom you are interviewing is not giving you truthful answers, ask him a question to which you already know the answer to see if he is being honest with you. Cross-check the answers you receive by asking interrelated questions.
5. Try to determine if Title I funded programs are operating anywhere else in the school system. For example, if Title I is supporting an experimental math program, find out whether experimental math is being offered in other schools.

6. If you do not complete the interview in the allotted time, ask for a second appointment.

Once you have determined through interviews and study of the Title I material what Title I programs are operating in which schools, you should visit those schools and talk to principals and teachers to see if Title I programs are actually operating there and if services are actually reaching the children for whom they are intended.

It is difficult to recommend just what you should look for, but in general you should try to determine if Title I activities are truly supplementary to the main program or whether they are simply a part of the regular educational program in all schools. To answer this you will have to visit non-Title I schools to make a comparison. You should attempt to identify Title I--purchased equipment and Title I-funded construction. Has it been used recently or is it still in crates in the storeroom? Has construction, repair, or remodeling simply provided facilities that other schools already have? Has construction been related directly to a Title I program?

Sometimes Title I has purchased a building or mobile units for use as a curriculum materials center or other central facility. You should visit this and find out who uses it. Do all schools benefit from it? May any teacher check material or equipment out? One way to determine this is to examine the checkout cards similar to those a library has for the books it loans.

If your school district operates a reading clinic, a special school or classes, or any other facility with Title I funds which is apart from the other schools, you should visit it and learn as much as possible about it.

VI. PARENT COUNCILS

Federal Regulations now require that each school district that receives Title I funds must have a Title I Parent Council. This new rule is a big improvement over past federal policy which only recommended that parent committees be established. The Federal Regulations on Parent Councils are included in this kit. Although they will be helpful to Title I parents in their efforts to seek the legal and effective use of funds, the Federal Regulations leave most of the details of organizing parent councils up to local school officials. Unless poor parents organize to insure an effective Title I Parent Council, there is a real danger that the Council will become a rubber stamp for the school administration.

Organization

A district-wide Title I Parent Council must be established by the school district, according to Federal Regulations, and it must be made up of "more than a simple majority of parents of educationally deprived children" residing in the attendance areas which will be served by the Title I project. This means that any parent of a child who is behind grade level or who is behind the educational level for his age may be a member of the council, even if the child is not now participating in the Title I program. Most, if not all, of these parents will be low-income because Title I funds must be concentrated in schools with the greatest percentage of poor children.

The phrase "more than a simple majority" means that more than 51% of the members must be the type of parents described. Parents should try to get a 100% or 75% parent council, but in any case, parents should clearly be the controlling factor on the council.

The local school district must make sure that the parents on the Parent Council are representatives of the children to be served by Title I projects (including parents of children in private schools) and representatives of the schools which are included in the Title I program.

These Regulations also provide that an existing organization (for example if there was a Title I parent committee last year) may be designated by school officials as the new Title I Parent Council if the composition of the old group is modified to include "more than a simple majority" of parents of educationally disadvantaged children.

Beyond this, the Federal Regulations do not say how many members there must be, how they will be chosen, who will be chairman or any other details. Since there are no federal rules on these important matters, poor parents must get in on the formation of these councils early so that they can have something to say about how they are set up.

How Are Members Chosen?

The Federal Regulations are silent on how members of the Parent Council should be chosen, but they do say that parents on the Council may not be employed by the local school district.

You and your group should consider how you think it would be best to choose members for the Council and urge school officials to adopt your ideas. In considering this problem, you may wish to think about the following questions:

1. Should parents be elected by the community or appointed by school officials or the school board, or some combination of the two methods?
2. What should the process for election or appointment be? What is the method that will produce the strongest advocates for poor parents?
3. Should parents represent schools, local Title I Parent Councils, or Title I programs?
4. How will non-parents be chosen to sit on the Council? What community organizations and social service agencies in the community should be represented on the Title I Parent Council?
5. How will the chairman be chosen?
6. Which school officials will sit on the Council and how will they be chosen?

What Are The Council's Rights?

Federal Regulations provide that:

1. Each member of the Parent Council must be furnished FREE copies of the Title I law, regulations, guidelines, local project application, and any other information which will aid in the planning, development, operation, and evaluation of the Title I program.
2. The Parent Council must be given "an adequate opportunity" to consider the information available and to make recommendations concerning the needs of poor children and the types of programs that will be operated to meet those needs. The Parent Council is, by federal policy, an advisory body only, but of course, the stronger and more active the Council, the more influence it can have.
3. The Parent Council must be able to look at prior evaluations of the Title I program.

4. The Parent Council has the right to submit its comments on the proposed Title I program to the State Title I Office. The State Title I officials have an obligation to consider the views of the Parent Council in deciding whether to approve all or part of the district's application for funds. Although the Federal Regulations do not say so exactly, the State Title I office should be obligated to respond directly to the Parent Council considering the action it took on the matters raised by the Council. All parents whether on the Council or not, have a right to present their views to the Parent Council, to the local school officials, to the state or to the Federal government.

What the School District Must Do

Although the Title I parent Council is only an advisory committee, the school district should give very serious consideration to its views. The school district should thoroughly justify its proposals for use of funds, particularly if the Council disapproves of or is skeptical of the plans. By appealing to the state education department, by reserving the right to file complaints or lawsuits, or by taking other action, the Parent Council can at least impress the school officials with the seriousness of its position.

Specifically, the local school officials must do the following, according to the new Federal Regulations:

1. the school district must provide the parent council with its plans for future Title I projects and programs;
2. the school district must tell the Council what the process of planning and developing the Title I proposal will be. It should announce the time schedule for planning the proposal, for submitting it to the Parent Council, to the school board, and to the state for approval.
3. the Title I project proposal must include "specific provisions for informing and consulting with parents," including the ways in which parents can assist their children in getting the full benefits of the program.
4. school officials must consider the views of the Parent Council concerning the unmet needs of children living in Title I target areas, and state in the project application the priority given to those needs in planning the Title I program.
5. school officials must also consider and incorporate into the planning process the views of the Parent Council on the concentration of programs and services in specific schools and grades.

What Can Parent Councils Do to be More Effective?

There are many things that a Title I Parent Council can do that are not specifically spelled out in the Federal Regulations. Here are some suggestions.

1. Organize the Council into committees; adopt a constitution and bylaws; elect a chairman.
2. Request that some operating funds for the Parent Council be included in the Title I budget so that the Council will have some money for expenses. The State Department of Education can approve such a request by local officials. If the school district refuses to do this, seek private money in the community from some sympathetic organization.
3. Funds for the Parent Council could be used to:
 - a. print stationery;
 - b. hire part-time or full-time assistance, including consultants to assist the Council in evaluating Title I programs;
 - c. run public information meetings in the community;
 - d. run training programs for Title I parents, teacher aides or Title I staff members;
 - e. travel to other school districts to observe compensatory and remedial programs which are of interest to the Council;
 - f. purchase material and literature for the Council's use on compensatory education and the problems of educationally disadvantaged children.
4. Organize a training session for members of the Parent Council, and other active parents or community groups on the purpose of Title I, how it works, and how the funds are being spent locally. Parent Council members could be reimbursed for expenses involved in attending these training sessions, such as transportation and baby-sitting costs.
5. Conduct public meetings in poor communities to provide information to parents as well as to receive complaints concerning the Title I program.
6. Conduct a clothing drive by finding out the need for clothing among Title I participants and by urging the school district to include clothing in the Title I budget.
7. File complaints with the Office of Education and the State Department of Education, if necessary, to correct illegal and ineffective Title I expenditures.

How Can Parents Become Involved in the Title I Program?

Any parent of a Title I eligible child can make a valuable contribution to the operation of the program if the school district makes provisions for really genuine parent involvement.

These are some ideas which you might suggest to the Parent Council or to local school authorities:

1. Involve poor parents in the initial planning of the Title I project, by establishing Parent Councils at each school which could plan the Title I program for that school.
2. Poor parents could be hired as education aides in the program. Appropriate training could assist them in performing their jobs in the Title I program.
3. Title I teacher aides should have access to training which could eventually lead to certification as a regular teacher.
4. Parents could assist the Council in taking surveys of children's needs or in distributing information about the Title I program or its supportive services to the community.

VII. COMMUNITY ACTION

After collecting and analyzing all available information, you should be able to determine the extent to which educationally disadvantaged children in your community are being helped by Title I funds. If your evaluation of Title I programs reveals illegal use of funds or ineffective programs, there are several actions which members of the community can take to remedy the situation. These are suggestions which will have to be varied according to the circumstances in your own community.

The Complaint

Immediately draft and file a formal complaint thoroughly documenting your allegations and requesting an investigation. A sample copy of a complaint is included in this kit. Send copies of the complaint with a covering letter demanding an investigation, a program review, and an audit to federal and state officials. The purpose of submitting the complaints to federal and state officials is that it is their responsibility under the law to insure that funds are spent legally and that the program is operating the way Congress intended.

Specifically, send copies to:

- a. each member of your local school board
- b. the mayor of your city or town
- c. your local Title I coordinator
- d. the state Title I coordinator
- e. the Governor of your state
- f. your state representative
- g. your state Superintendent of Public Instruction
- h. both of your state's United States Senators
- i. your Congressman
- j. every newspaper, radio and television station within a wide radius of your community
- k. Secretary
Department of Health, Education and Welfare
330 Independence Avenue, S.W.
Washington, D.C. 20201
- l. Commissioner of Education
U.S. Office of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202
- m. Mr. Richard Fairley
Division of Compensatory Education
U.S. Office of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

- n. your local Community Action Agency (CAP board)
- o. Legal Defense Fund
1028 Connecticut Avenue, N.W.
Suite 510
Washington, D.C. 20036

In addition, you will want to send a separate letter with your complaint to Mr. Edward Stepnick, Director, HEW Audit Agency, Room 3237, North HEW Building, 330 Independence Avenue, S.W. 20201, requesting a Federal audit of Title I funds in your community. The complaints which receive the greatest attention by federal authorities are those in which Title I violations are specifically named and well documented.

While past experiences with the federal government may lead you to believe that your efforts will be futile, the formal complaints should, nevertheless, be prepared and filed. Formal complaints may help exert pressure on state and local officials to take corrective action. Formal complaints will focus local attention on the issues you raise. While the actual preparation of the complaint may involve only a small group of people, the action generated by filing the complaint can involve the entire community in planning new alternatives and, thus, serve as a tool for community organization.

Local Officials

When the complaint has been compiled and the community is sufficiently organized, send a delegation to local officials to protest the illegal use of Title I funds. Approach the local Title I coordinator, the local school superintendent, and members of the school board. Attract as much favorable newspaper attention as possible to your cause.

State Officials

Make an appointment to present your complaint to the state Title I coordinator. Send a delegation to the state office to publicly protest improper administration of the program and the failure of state officials to enforce provisions of the law. Be prepared to back up your charges. Demand that the state take steps to correct misuse of the funds.

Legal Action

Several Title I lawsuits have been filed by parents of eligible children. These suits charge that school districts have misspent Title I funds in various ways. The charges mostly concern the use of Title I funds as general aid, the supplanting of state and local funds, the failure to spend money only on eligible children, and the absence of any meaningful parent involvement. Generally, the suits ask that the local

officials stop illegally spending funds and return misspent funds to Title I children. Further, these suits demand that state and federal officials obey the law and approve only legal projects.

If community pressure fails to correct Title I problems, your only recourse may be to take legal action. You should seek out attorneys from the local OEO legal service office or local civil rights lawyers. In addition, the Harvard Center for Law and Education and the Lawyers Committee for Civil Rights Under Law can provide legal backup for local lawyers.

Planning for the Future

It is important to organize your community activities so that they affect future as well as present Title I programs. The timing of your actions can determine how much you will accomplish. Try to find out the time schedule for submitting the Project Application Form for next year's project. Your group should be aware of the local superintendent's schedule -- when the project proposal will be brought before the school board -- so you can be there to comment, support, or demand changes in the proposed Title I program.

It could be good strategy for the community to hold hearings at the same time the proposal is being drawn up. Ask local school officials to send a delegate to your meeting to discuss the proposed Title I program.

If you cannot find out when the application will be sent in or cannot get a draft of the project proposal before it is submitted, draft and send in your own proposal to state officials, demanding that no project be approved unless it meets the standards of the Federal Regulations and Program Criteria.

VIII. COMPENSATORY EDUCATION AND OTHER FEDERAL PROGRAMS

While you are evaluating and trying to improve present Title I programs, you should also be thinking about new programs which may be needed in your community. Here are some suggestions for planning a sound educational program:

1. See that educationally disadvantaged children get an early start in learning and that there is some way to continue gains they make.
2. Demand to have well-trained teachers who can handle their special jobs and can motivate their students.
3. See that classes are small enough for individualized instruction.
4. See that the school is equipped with appropriate facilities and materials.
5. See that supplementary services (health, food, and clothing) are provided where needed.
6. Continue to involve parents in the process of education by encouraging active participation in planning and carrying out programs.

Other Title I Programs

The Office of Education has published a series of booklets reviewing and outlining successful Title I programs designed to meet special needs of children in various communities. Success was measured in terms of improved scores of standardized tests. These booklets are available for sale by the:

Superintendent of Documents
Government Printing Office
Washington, D.C. 20402

The booklets are in four series as outlined below:

Series 1. Preschool Program in Compensatory Education

- Preschool Program, Fresno, California (FS 5.237: 37034 - Price .25 cents)
Infant Education Research Project, Washington, D.C. (FS 5.237: 37033 - Price .35 cents)
Early Childhood Project, New York City (FS 5.237: 37027 - Price .35 cents)
Perry Preschool Project, Ypsilanti, Michigan (FS 5.237:37035 - Price .25 cents)
Diagnostically Based Curriculum, Bloomington, Indiana (FS 5.237:37024 - Price .45 cents)
Academic Preschool, Champaign, Illinois (FS 5.237: 37041 - Price .35 cents)

Series 2. Elementary Program in Compensatory Education

- More Effective Schools, New York City (FS 5.237: 37042 - Price .40 cents)
Intensive Reading Instructional Teams, Hartford, Connecticut (FS 5.237:37038 -
Price .25 cents)
After School Study Centers, New York City (FS 5.237:37036 - Price .25 cents)
Self-Directive Dramatization Project, Joliet, Illinois (FS 5.237: 37037
Price .25 cents)
Project Concern, Hartford, Connecticut (FS 5.237: 37030 - Price .25 cents)
Elementary Reading Centers, Milwaukee, Wisconsin (FS 5.237:37031 - Price .20 cents)
School and Home Program, Flint, Michigan (FS 5.237:37023 - Price .25 cents)
Programmed Tutorial Reading Project, Indianapolis, Indiana (FS 5.237:37029 -
Price .20 cents)
Speech and Language Development Program, Milwaukee, Wisconsin (FS 5.237:37028 -
Price .25 cents)

Series 3. Elementary-Secondary Program in Compensatory Education

- Homework Helper Program, New York City (FS 5.237:37025 - Price .25 cents)
Communication Skills Center Project, Detroit, Michigan (FS 5.237:37039 -
Price .25 cents)

Series 4. Secondary Program in Compensatory Education

- Junior High Summer Institutes, New York City (FS 5.237:37026 - Price .25 cents)
Project R-3, San Jose, California (FS 5.237:37040 - Price .25 cents)
College Bound Program, New York City (FS 5.237:37032 - Price .20 cents)

Other Federal Programs

There are other programs of federal assistance which may contribute substantially to the Title I program in your district.

1. Project Follow Through

This program is designed to build up any gains that educationally disadvantaged children may have made in Title I pre-school or Head Start classes. It is a comprehensive program which serves not only the educational needs of poor children, but their physical, social and psychological needs as well. Each 'Follow Through Community' associates with colleges or regional educational laboratories which have developed new approaches to the education and development of young children. The program encourages the school, the neighborhood and the community to work together. Some parents also serve in the classroom as paid volunteers or observers; some develop educational and community services.

For the most part, Follow Through grants will be made to local public educational agencies. In certain cases, however, a project grant may be made to some other agency or to a community group. For instance, if a local educational agency is unable or unwilling to provide Follow Through services to certain groups of children, a community organization may receive a grant to provide services to eligible children.

Final decisions about funding Follow Through programs are made by the Office of Education. OE normally takes into account recommendations of state educational agencies, state economic opportunity offices, local CAP administrators, and consultants whom they assign to assist communities during the project development stage.

For further information write to: Follow Through
U.S. Office of Education
400 Maryland Avenue, S.E.
Washington, D.C. 20202

2. Education Professions Development Act

One of the best ways to improve the quality of education in the schools of your community is by providing specialized retraining programs for teachers and by recruiting more well-trained school personnel.

The Education Professions Development Act (EPDA) is designed to help local school systems, state education agencies, and colleges and universities develop more effective ways to recruit, train, and utilize educational personnel. EPDA ties together a number of programs aimed at the training and retraining of these personnel. Under EPDA a number of programs -- including short-term summer training institutes, academic year fellowships for both prospective and experienced teachers and the Teachers Corps -- were brought together and expanded.

In administering EPDA the U.S. Office of Education has established ten priority areas to help meet the most urgent educational needs of the nation. Fifty percent of all funds allocated under the ten priority areas will be used to support the projects designed to train or retrain educational personnel who deal directly with low-income families.

For specific information about the many different kinds of programs sponsored by EPDA contact: The Bureau of Educational Personnel Development, Office of Education, United States Department of Health, Education, and Welfare, Washington, D.C.

Two of the programs under EPDA which can be used in conjunction with the Title I program in your community are the Career Opportunities Program and the Teacher Corps.

Career Opportunities Program

This is a nationwide work-study program which serves low-income children. Its aim is to improve education in city and rural schools. It is designed to attract persons from low-income backgrounds, people with or without high school diplomas or college diplomas, veterans, and college graduates into careers in schools serving low-income populations.

The Career Opportunities Program attracts persons into education who would not normally have the opportunity for careers in education. It also helps school districts and universities create programs that are more relevant to the needs of low-income people and to the needs of recruits themselves. The local school districts, usually the agencies through which the programs are funded, design training programs jointly with community organizations and agencies, community colleges or nearby universities, and with their State Department of Education.

Training combines academic study toward the AA or AB degrees or high school equivalency with classroom work in low-income schools supervised by experienced personnel. The Career Opportunities Program encourages men and women to start their careers in education at whatever levels their abilities and interests permit. They can then follow a career ladder leading from jobs as aides to more responsible or simply more interesting jobs and finally to fully certified teaching and equivalent positions in low income-area schools.

The eligibility of applicants is determined by the Office of Education. Applications are selected chiefly in locations that are designated Model City areas and/or locations that have large concentrations of low-income people. There must also be successful upgrading programs already operating in the community on which to build substance and share costs. Some of these programs might be: Head Start, Follow Through, Upward Bound, Urban Corps, Teacher Corps, VISTA, and New Careers.

Local school districts and institutions of higher learning that believe they meet the criteria may write to:

Career Opportunities Program
Division of School Programs
Bureau of Educational Personnel Development
Office of Education
U.S. Department of Health, Education, and
Welfare
Washington, D.C.

Such letters of interest should cover all the relevant facts about your community. In reply, the Office of Education will provide more information and will give your school district or educational institution an indication of the possibility of funding.

Teacher Corps

To establish a Teacher Corps Program in your area, you need the combined efforts of the local school, a nearby university or college, and your community. These three groups must submit a joint grant proposal before the project can be funded.

Teacher Corps interns are specially trained for working with disadvantaged children. They function as supplementary personnel in the school. A team of 5-8 persons is assigned to the local school to demonstrate new teaching methods and make suggestions for improving the schools.

Because Teacher Corps interns must be enrolled in courses at a university which has imaginative educational programs, the program guides presently require that the university or college be located near the community.

To start a Teacher Corps Program in your area, write to: Teachers Corps, Programs Branch, Washington, D.C. 20202, expressing your interest and submitting plans for your proposed program, if these plans have already been drawn up.

APPENDIX A
FEDERAL AND STATE OFFICIALS

U.S. Office of Education

States Covered

Gus Cheatem
(202) 963-7955

Connecticut, Maine, Massachusetts,
New Hampshire, New Jersey, New York,
Puerto Rico, Rhode Island, Vermont,
Virgin Islands

Ben Rice
(202) 963-3678

Delaware, District of Columbia,
Illinois, Indiana, Maryland,
Michigan, Minnesota, Ohio,
Pennsylvania, Virginia, West Virginia,
Wisconsin

John Pride
(202) 963-7958

Alabama, Florida, Georgia, Kentucky,
Mississippi, North Carolina, South
Carolina, Tennessee

Gene Fusco
(202) 962-8833

Arkansas, Iowa, Kansas, Louisiana,
Missouri, Nebraska, New Mexico,
Oklahoma, Texas

Bill Bryant
(202) 962-3611

Alaska, Arizona, California,
Colorado, Hawaii, Idaho, Montana,
Nevada, North Dakota, Oregon,
Pacific Islands, South Dakota, Utah,
Washington, Wyoming

TITLE I STATE COORDINATORS

ALABAMA
(205) 269-7357

Mr. William E. Mellown, Coordinator of Title I, ESEA,
State Department of Education, State Office Building,
Room 460, Montgomery 36104

ALASKA

Mr. Kenneth Grieser, Coordinator of Federal Programs,
State Department of Education, 326 Alaska Office Building,
Juneau, Alaska 99801

8 (202) 583-9150--

for Seattle - ask for Juneau 586-5255

ARIZONA
(602) 271-5235

Mr. Lawrence P. Lemons, ESEA Title I Director,
State Department of Public Instruction,
1688 West Adams, Phoenix 85007

ARKANSAS
(501) 371-1287

Mr. B. G. Williams, Associate Commissioner for Federal
Programs, State Department of Education, Arch Ford
Education Building, Little Rock 72201

CALIFORNIA Mr. Leo R. Lopez, Associate Superintendent and Chief,
(916) 445-2590 Division of Compensatory Education, State Department of
Education, 721 Capitol Mall, Sacramento 95814

COLORADO Mr. Ward Vining, Director, Title I, ESEA,
(303) 892-2256 State Department of Education, State Office Building
Denver 80203

CONNECTICUT Dr. Alexander J. Plante, Coordinator of Title I, ESEA
(203) 566-4382 State Department of Education, P. O. Box
165 Capital Avenue, Room 360, Hartford 06115

DELAWARE..... Mr. William Corkle, Coordinator of Title I, ESEA
(302) 678-4867 State Department of Public Instruction
P.O. Box 697, Dover 19901

DISTRICT OF
COLUMBIA Mrs. Frances Watts, Coordinator of Title I, ESEA
(202) 737-1845 1411 K Street, N.W., Room 1008, Washington, D.C. 20004

FLORIDA Mr. Harold Lewis, Coordinator of Title I, ESEA,
(904) 599-5151 Department of Education, 219 W. Jefferson Street,
Tallahassee 32304

GEORGIA Mr. Billie Tidwell, Coordinator of Title I, ESEA,
(404) 688-2390 State Department of Education, State Office Building,
ext. 465 Room 316, Atlanta 30334

HAWAII Mr. John Uchima, Administrator, Compensatory Education,
8 (415) 556-0220 Hawaii Department of Education, P.O. Box 2360
Honolulu 96804
Ask Oper. for Dr. Clarence Masumotoya, Director, Federal Programs
Honolulu Tele. Hawaii Department of Education, Honolulu
#548-2811 ext. 694

IDAHO Mr. D. L. Hicks, Program Administrator, Title I, ESEA
(208) 384-2195 Department of Education, Boise 83707

ILLINOIS Mrs. Lenore Powell, Coordinator of Title I, ESEA
(217) 525-6036 Office of Superintendent of Public Instruction
316 South Second Street, Springfield 62706

INDIANA Mr. Cyrus Gunn, Director, Federal Projects Division
(317) 633-4436 State Department of Public Instruction, 803 State Office
Building, 100 Senate Avenue, Indianapolis 46204

IOWA Dr. Oliver T. Himley, Chief of Title I, ESEA
(515) 281-5313 Department of Public Instruction, Grimes Office Building
Des Moines 50319

KANSAS Mr. Kenneth Gentry, Director of Title I, ESEA
(913) 296-3458 State Department of Education, Kansas State Education
Building, 120 East 10th Street, Topeka 66612

KENTUCKY Mr. John Bruce, Coordinator of Title I, ESEA
(502) 564-3301 State Department of Education, Frankfort 40601

LOUISIANA Dr. Harold Denning, Jr., State Administrator, Federally
(504) 389-5291 Assisted Programs, State Department of Education, New
Education Building, Baton Rouge 70804
(504) 389-5291 Mr. Charles Jarreau, Coordinator Title I, ESEA
State Department of Education, Baton Rouge 70804

MAINE Mr. James Morrison, Coordinator of Title I, ESEA
(207) 289-2475 State Department of Education, Education Building
Augusta 04330

MARYLAND Dr. Percy Williams, Coordinator of Title I, ESEA
(301) State Department of Education, 301 West Preston Street
Baltimore 21201

MASSACHUSETTS Mr. Robert Jeffery, Coordinator of Title I, ESEA
(617) 727-5756 State Department of Education, 182 Tremont Street,
Boston 02116

MICHIGAN Mr. Louis Kocsis, Chief Administrator, Compensatory
(517) 373-3666 Education, State Department of Education, Box 420
Lansing 48902
(517) 373-3666 Mr. Kenneth Swanson, Coordinator of Title I, ESEA
State Department of Education, Box 420, Lansing 49802

MINNESOTA Mr. Jack Hanson, Coordinator of Title I, ESEA
(612) 221-2181 State Department of Education, Centennial Office Building
St. Paul 55101

MISSISSIPPI Mr. W. L. Hearn, Coordinator of Title I, ESEA
(601) 354-6944 State Department of Education, P.O. Box 771
Jackson 39205

MISSOURI Mr. D. C. McCullough, Director of Title I, ESEA
(314) 635-8125 State Department of Education, P.O. Box 480
Jefferson City 65101
(314) 635-8125 Mr. P. J. Newell, Jr., Assistant Commissioner, Division of
Instruction, State Department of Education
Jefferson City 65101
(314) 635-8125 Mr. John T. Lawrence, Coordinator of P.L. 89-10
State Department of Education
Jefferson City 65101

MONTANA Mr. Clark W. Fowler, Director of Basic Skills,
 (406) 449-2410 Office of State Superintendent of Public Instruction
 Helena 59601
 Mr. Dean Lingahl, ESEA Title I, Supervisor
 Office of State Superintendent of Public Instruction
 Helena 59601

NEBRASKA Mr. Robert E. Dyke, Federal Projects Director,
 (402) 473-1212 State Department of Education, State Capitol Building
 Lincoln 68509
 (402) 473-1212 Mr. Larry Vontz, Coordinator, Title I, ESEA
 State Department of Education, State Capitol Building
 Lincoln 68509

NEVADA Mr. James Kiley, Director, Federal Relations,
 (702) 882-7324-29 State Department of Education, Carson City 89701

NEW HAMPSHIRE Mr. Richard Hodges, Coordinator-Director of Title I, ESEA
 (603) 271-2717 Division of Instruction, State Department of Education,
 64 North Maine Street, Concord 03301

NEW JERSEY Mrs. Jane B. Holub, Coordinator of Title I, ESEA
 (609) 292-5790 State Department of Education
 225 West State Street, Trenton 80625

NEW MEXICO Mr. Donald L. Harvey, Director of Title I, ESEA Programs
 (505) 827-2441 State Department of Education, Santa Fe 87501

NEW YORK Mr. Louis Pasquini, Coordinator of Title I, ESEA
 (518) 474-1231 State Department of Education, Room 367
 5623 Albany 12224

NORTH CAROLINA ... Mr. Harold H. Webb, Coordinator of Title I, ESEA
 (919) 829-7665 State Department of Public Instruction, Raleigh 27602

NORTH DAKOTA Mr. Warren Pederson, Coordinator of Title I, ESEA
 (701) 224-2282 State Department of Public Instruction, State Capitol
 Building, Bismark 58501

OHIO Mr. Arlie E. Cox, Coordinator of Title I, ESEA
 (614) 469-4161 State Department of Education, 3201 Alberta Street,
 Columbus 43204
 (614) 469-4161 Mr. James Miller, Chief, Special Programs Section,
 State Department of Education
 3201 Alberta Street, Columbus 43204.
 (614) 469-2223 Mr. Raymond A. Horn, Director, Division of Federal
 Assistance, State Department of Education, State Office
 Building, Room 605, 65 South Front Street, Columbus 43215

OKLAHOMA Mr. Ray Wellingham, Director of Title I, ESEA
 (405) 521-3315 State Department of Education, Will Rogers Building,
 Room 310, Oklahoma City 73105

OREGON Dr. Willard Bear, Director of Federal Programs,
 (503) 378-3606 State Department of Education, Salem 97310
 Mr. Dale Skewis, Coordinator of Title I, ESEA
 State Department of Education, Salem 97310

PENNSYLVANIA Mr. William Dellums, Assistant Director, Division of
 (717) 787-7654 Compensatory Education, Department of Public Instruction,
 Education Building, Room 582, Harrisburg 17126
 (717) 787-7653 Mr. John Hyams, Coordinator, Title I, ESEA, Division of
 Compensatory Education, Department of Public Instruction
 Education Building, Room 581, Harrisburg 17126

RHODE ISLAND Mr. Edward T. Costa, Consultant for Compensatory Education
 (401) 227-2841 State Department of Education, Roger Williams Building,
 42 or 43 Hayes Street, Providence 02908

SOUTH CAROLINA ... Mr. Danny Brabham, Coordinator of Title I, ESEA
 (803) 758-3471 State Department of Education, Rutledge Building,
 Room 201, Columbia 29201

SOUTH DAKOTA Mr. Lyndon M. Loken, Coordinator of Title I, ESEA
 (605) 224-3218 State Department of Public Instruction, Pierre 57501

TENNESSEE Mr. Ervin H. Thomas, Coordinator of Title I, ESEA
 (615) 741-3433, State Department of Education, 221 Cordell Hull Building,
 3434, 3889 Nashville 37219

TEXAS Mr. R. E. Slayton, Director, Division of Compensatory
 (512) 475-4126 Education, Texas Education Agency, 201 East 11th Street
 Austin 78711

UTAH Dr. N. Craig Kennington, Specialist, Title I, ESEA
 (801) 328-5061 State Department of Public Instruction, 136 South Temple,
 E. Salt Lake City 84114

VERMONT Mr. Allan J. Heath, Chief, Special Projects, State
 (802) 223-2311 Department of Education, State Office Building,
 ext. 515 Montpelier 05602

VIRGINIA Mr. Robert W. Sparks, Coordinator of Title I, ESEA
 (703) 770-3179 State Board of Education, Richmond 23216

WASHINGTON Mr. Robert G. Lindemuth, Federal Liaison Officer,
 (206) 753-6749 Office of the State Superintendent of Public Instruction
 or 6756 Olympia 98501
 (206) 753-2562 Mr. Milo Long, Project Leader for Title I, Olympia 98501

WEST VIRGINIA Mr. J. C. Sovine, Acting Coordinator of Title I, ESEA
(304) 348-2701 State Department of Education, State Capitol Building
Room W-217, Charleston 25305

WISCONSIN Mr. Frank N. Brown, Coordinator of Title I, ESEA
(608) 266-2699 State Department of Public Instruction
126 Langdon Street, Madison 53703

WYOMING Mr. Glenn Reynick, Director, Title I
(307) 777-7343 State Department of Education
Cheyenne 82001
(307) 777-7751 Mr. Melvin H. Gillispie, Coordinator of Federal Programs
State Department of Education
Cheyenne 82001

AMERICAN SAMOA .. Mr. Eddie Ikard, Special Assistant to the Director of
Education, Department of Education, Pago Pago 96920
Mr. Richard L. Balch, Commissioner of Education

GUAM Mr. Albert T. San Agustin, ESEA, Title I Coordinator,
Federal Programs Office, Department of Education, AGA
Agana 96910

PUERTO RICO Mr. Francisco R. Girona, Coordinator of External Resources,
(809) 766-1096 Department of Education, Hato Rey 00900

TRUST TERRITORIES Mr. Kenneth D. Streitmatter, Federal Program Coordinator,
Department of Education, Trust Territory of the Pacific
Islands, Saipan, Mariana Islands 96950

VIRGIN ISLANDS .. Miss Aline M. Kean, Coordinator, Title I, ESEA
(809) 774-5394 Department of Education, Charlotte Amalie
St. Thomas 00802

APPENDIX B

WHO CAN HELP?

This is a partial list of people and organizations that may be helpful to you on Title I and related issues.

Children's Foundation
1026 Seventeenth Street, N.W.
Washington, D.C. 20036
(202) 296-4451

Harvard Center for Law and
Education
38 Kirkland Street
Cambridge, Massachusetts 02138
(617) 495-4666

Lawyers Committee for Civil
Rights Under Law
733 Fifteenth Street, N.W.
Washington, D.C. 20005
(202) 628-6700

League of Women Voters in your
community

National Welfare Rights
Organization
1419 H Street, N.W. Fourth Floor
Washington, D.C.
(202) 347-7727

Washington Research Project
1823 Jefferson Place, N.W.
Washington, D.C. 20036
(202) 659-4880

Miss Barbara Bode
Information and assistance on school
lunch and breakfast programs--the
laws, regulations, and possible
community action

Legal problems in education includ-
ing Title I and Johnson-O'Malley
issues, tracking and grouping,
students' rights, bilingual educa-
tion, etc.

Stephen Browning, Esq.
Contact to find out if there is a
local Lawyers Committee in your area

Local Leagues can be helpful in
gathering and analyzing Title I in-
formation and in writing letters

Assistance to local WRO chapters.

Michael Trister, Esq.
General legal and other assistance
with Title I and school desegregation
issues

The Division of Legal Information and Community Service of the Legal Defense Fund has four offices that can provide assistance on Title I or school desegregation problems.

Allen Black
Legal Defense Fund
46 North Third Street
Suite 716
Memphis, Tennessee 38103
(901) 525-1677

Phyllis McClure
Legal Defense Fund
1028 Connecticut Avenue, N.W.
Suite 510
Washington, D.C. 20036
(202) 833-1898

Carl Ulrich
Legal Defense Fund
12 Geary Street, Eighth Floor
San Francisco, California 94102
(415) 788-8736

Robert Valder
Legal Defense Fund
White House Inn
237 West Trade Street
Charlotte, North Carolina 28202
(704) 332-6121