

DOCUMENT RESUME

ED 094 075

UD 014 444

TITLE Title I ESEA: How It Works. A Guide for Parents and Parent Advisory Councils.

INSTITUTION Office of Education (DHEW), Washington, D.C. Office of Programs for the Disadvantaged.

REPORT NO DHEW-OE-73-07104

PUB DATE 73

NOTE 62p.

AVAILABLE FROM Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402 (Stock No. 1780-01231, \$1.15)

EDRS PRICE MF-\$0.75 HC-\$3.15 PLUS POSTAGE

DESCRIPTORS *Advisory Committees; Educational Needs; Federal Aid; Federal Laws; Federal Programs; Financial Support; Government Role; *Guides; *Parent Participation; Parent Responsibility; *Program Development; Project Applications; State Laws

IDENTIFIERS *Elementary Secondary Education Act Title I; ESEA Title I

ABSTRACT

Title I of the Elementary and Secondary Education Act (ESEA) is the largest Federal aid to education program. Public Law 89-10 did not limit the kinds of services which could be provided with Title I funds. It is important that parents understand what Title I is all about. As members of the advisory council and even as taxpayers, they must see that funds are properly spent, that children who need help most receive it, and that federal and state laws are followed in distributing and using Title I funds. This book is an effort to see that the Title I program works by making sure it is properly understood. It is divided into four parts. Part 1 contains the basic information parents need to know about Title I--what activities it can fund and which children it can help. The second part summarizes the rights and responsibilities of the parent advisory council and other parents under Title I. Helpful suggestions for parents also appear throughout the guide. The third part concentrates on local, state, and federal responsibilities under Title I; that is, what parents can expect their state or local education agency and the U.S. Office of Education to do. The last part gives a brief account of the Title I funding process and how Title I target areas are chosen. (Author/JM)

U.S. DEPARTMENT OF HEALTH,
EDUCATION & WELFARE
NATIONAL INSTITUTE OF
EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY.

TITLE I ESEA: HOW IT WORKS

A Guide for Parents & Parent Advisory Councils

U.S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

CASPAR W. WEINBERGER, *Secretary*

S. P. MARLAND, JR., *Assistant Secretary for Education*

Office of Education

JOHN OTTINA, *Commissioner*

ED 094075

UD 014444

U.S. GOVERNMENT PRINTING OFFICE
WASHINGTON: 1973

For sale by the Superintendent of Documents, U.S. Government Printing Office
Washington, D.C. 20402 - Price \$1.15
Stock Number 1780-01231

Foreword

Title I of the Elementary and Secondary Education Act (ESEA) is the largest Federal aid to education program. It was the first and most important Federal program assigned to the U.S. Office of Education to recognize that economically and educationally deprived school children may need extra help—or what educators commonly call compensatory education—to do well in school.

This book is an effort to see that the title I program works by making sure it is properly understood. The book is written especially for parents serving on title I advisory councils and other parents whose children are eligible to receive title I services.

It is important that parents understand what title I is all about. As members of the advisory council and even as taxpayers, they must see that funds are properly spent, that children who need help most receive it, and that Federal and State laws are followed in distributing and using title I funds.

Public Law 89-10, which included title I, and its amendments are complicated legal documents. The guidelines issued by the U.S. Office of Education concerning title I include many legal and educational terms. As much as possible, this publication is written in laymen's terms; however, some legal and technical language is used to acquaint parents with the use and meanings of this language. Appended to this book is a glossary explaining these words.

Title I ESEA: How It Works is divided into four parts. The first part of the guide contains the basic information parents need to know about title I—what activities it can fund and which children it can help. The second part summarizes the rights and responsibilities of the parent advisory council and other parents under title I. Helpful suggestions for parents also appear throughout the guide. The third part of the guide concentrates on local, State, and Federal responsibilities under title I; that is, what parents can expect their State or local education agency and the U.S. Office of Education to do. The last part gives a brief account of the title I funding process and how title I target areas are chosen.

Richard L. Fairley
*Director, Division of Education
for the Disadvantaged
Bureau of School Systems*

Contents

	<i>Page</i>
Foreword	iii
 Part I 	
WHAT CAN TITLE I DO?	3
Some General Guidelines	3
Teaching Assistance	4
Other Instructional Services	5
Supportive Services	5
Where To Get More Help	6
Supportive Services for Migrant Children	7
Equipment and Construction	7
Comparable Services	8
Applying for Title I Funds	11
WHOM CAN TITLE I HELP?	13
General Eligibility of Children	13
Special Categories of Eligible Children	14
Indian Children	14
Migrant Children	14
Children in State Institutions	15
Eligibility of Nonpublic School Children	15
Finding Out What Eligible Children Need	16
Identifying Educationally Deprived Children	17
Collecting Data on the Children	17
Diagnosing Educational Problems	17
Classifying the Needs of the Children	17
Establishing Priorities	17
 Part II 	
WHAT CAN (AND SHOULD) PARENTS AND PRIVATE CITIZENS DO UNDER TITLE I ESEA?	21
The Role of Parents in Title I Programs	21
Parents as Community Members	21
Parents as Helpers	22
Parents as Observers	22
The Role of the Parent Advisory Council	22
Federal Requirements	22
Establishing a Parent Advisory Council	23
Duties of a Parent Council	25

Duties of the Local School District	Page 25
How To File a Complaint	26

Part III

WHAT ARE THE LOCAL SCHOOL DISTRICT'S RESPONSIBILITIES UNDER TITLE I ESEA?	35
Keeping Everyone Informed About Title I	35
Evaluating Title I Projects	37
WHAT ARE THE STATE'S RESPONSIBILITIES UNDER TITLE I ESEA?	41
Approving Title I Applications	41
Monitoring and Assisting Local School Districts	42
Providing Assurances to OE	43
WHAT ARE THE FEDERAL GOVERNMENT'S RESPONSIBILITIES UNDER TITLE I ESEA?	45
Organization of the Office of Education	45
Federal Responsibilities for Title I	46
Approving or Not Accepting Title I Applications	46
Federal Rules Governing Title I	46
Overseeing State and Local Title I Programs	47
Publishing Information About Title I	47

Part IV

HOW DOES A SCHOOL DISTRICT GET TITLE I ESEA FUNDS?	51
Determining County Grants	51
Suballocating County Funds	52
Special Grants for Local School Districts	55
State Title I Grants	55
WHAT SCHOOLS OFFER A TITLE I PROGRAM?	59
Data Sources	60
Census Data	60
AFDC Data	60
Other Data Sources	60
Weighing Data Sources	61
Selecting Eligible Attendance Areas	62
Selecting Project Areas	62
Selecting Target Areas in Desegregated Districts	63
GLOSSARY	65

What Can Title I Do?

Public Law 89-10, the legislation which made title I a fact, did not limit the kinds of services which could be provided with title I funds. The first paragraph of the law, which always gives the reason for and intent of the law, says money will be given to local school districts to meet "the special educational needs of educationally deprived children." Each word of that phrase is important. The word "special" indicates title I funds should not be used to provide regular school services to needy children. In other words, the school district must provide *all* children with their basic education; title I should provide *extra* services. The word "educational" emphasizes the Federal Government's idea that title I should be an instructional, not a welfare type, program. This does not mean that title I services must be limited to classroom help. Congressional committees studying title I drew up a long list of services which might be provided; the list included many *supportive or auxiliary services*, the terms used to describe aid which is not strictly instructional. Supportive services might include free breakfast, medical exams, dental treatment, and field trips. But because title I is an educational program, these services must be related to some educational need. One section of this chapter goes into the question of supportive services in greater detail.

Title I services are provided as part of a title I project. The law defines a *project* as one or more activities designed to meet the special needs of educationally deprived children. Most school districts will have several title I projects. All these projects together make up the district's title I program.

This chapter gives only a small indication of the types of projects financed under title I. The Office of Education has published other booklets, including several detailed case studies of title I projects, which will give parents a more complete picture of the services available under title I. This chapter outlines the kinds of services which title I may pay for and to what extent these services may be provided.

SOME GENERAL GUIDELINES

The law itself and the criteria developed for title I by the Office of Education include some basic principles which must be followed in planning a title I project.

The law (compilation, section 141) says:

1. Projects must meet the special educational needs of educationally deprived children in school attendance areas having high concentrations of children from low-income families.

2. Projects must be of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting those needs.

The first point concerns the selection of target areas as discussed on pages 59-64. The second point means that, in terms of money, a school district may not spend less than \$2,500 on a title I project. There is an exception to this rule; a school district which because of distance or difficulty of travel cannot work with another school district to provide a title I project of that size may spend less than \$2,500. A project of "sufficient scope" implies that more than one service will be offered to needy children. For instance, a child having trouble with reading may not only need remedial instruction, he may also need glasses. The scope of the project should include all services necessary to solve the learning problems planners agreed in their needs assessment were most in need of attention. Quality is a difficult thing to judge, especially before a project actually starts. But parents should be sure that title I projects do not duplicate other programs which failed.

The criteria also make some points about title I programs and projects. These include:

1. A title I program should be part of an overall compensatory education program involving the use of resources from a number of programs and agencies.

Most school districts have a number of local, State, Federal, and private agencies serving the same children (or their families) whom title I helps. To be sure

that all available help is used and no services are duplicated, it is important for the parent council and school officials to work with representatives of other agencies in planning a title I program. This is especially important in programs where title I is paying for many supportive services. Parents will know what agencies provide help within the community; they should be sure these agencies are represented in planning sessions for the title I program. A later section in this chapter discusses some of the agencies which might provide help to title I children.

2. The title I program should support the regular school program and, where necessary, change it.

Most children who are educationally deprived are not responding positively to the regular school program. The title I program should not only help these children overcome their learning problems, it should also support changes in the regular school program, making it more responsive to student needs. The regular school program, the title I program, and any other special school programs should be planned together as a total educational package.

3. Program planners must consider providing title I services in summer as well as during the regular school year.

4. Educationally deprived children enrolled in desegregated private schools will have an opportunity to participate in the title I program. This point is discussed on pages 15-16.

The best rule of thumb is to look at what is provided in nontitle I areas of the school district. Any services paid for out of local and State money at a nontitle I school should be available at a title I school without using Federal funds.

Of course, any use of title I funds is dependent on a needs assessment (see page 16): the money should be spent on whatever will be most helpful in correcting children's learning problems.

The criteria also include some guidelines concerned with specific types of title I projects. These will be mentioned in other sections of this chapter.

TEACHING ASSISTANCE

A large portion of title I money is spent on teacher-related activities, such as the salaries of extra teachers and teacher aides, inservice training for title I personnel, and bonus payments for teachers.

Title I may not pay the salaries of regular school employees. For instance, title I should not pay the salary of a first-grade teacher just because the children she teaches are eligible for title I services. How-

ever, title I funds may be used to hire a second teacher or aide for that same class to provide more individualized attention for students.

Most teachers hired under title I have specific skills which the regular classroom teacher may not have or may not have the time to use. Many school districts hire remedial reading or math teachers as part of their title I program. Others employ language arts specialists to offer reading readiness to preschool children. Bilingual teachers will be needed for title I students who do not speak English. If these teachers work only with children eligible for title I services and their job is not the same as that of a regular school employee in a nontitle I school, their salaries may be paid for under title I.

Because many schools offering title I services are located in older neighborhoods and housed in old buildings, they sometimes have a hard time getting good teachers. To help correct this problem title I approved the use of Federal money to help get and keep good teachers in title I schools. Teachers receive extra money for teaching in a title I school; this money is called a *bonus payment*.

Most school districts do not include bonus payments in their title I programs. The few that do must show in their application that their title I schools have not been getting the best possible teachers, how more qualified teachers will be found and hired, what training these new teachers will receive, and how the effect of bonus payments on student learning will be evaluated. After 2 years the school district must prove the bonus payments did, in fact, help get and keep good teachers in title I schools.

Thousands of teacher aides now work in urban and rural schools as part of a title I program. These aides assist teachers in the classroom and work with students individually. Title I funds may not continue to pay the salaries of aides in title I schools if these aides perform the same duties as aides in nontitle I schools whose salaries are paid with State or local money.

Parents should be sure the aides employed in a title I program represent the community, and parents themselves, if they apply, must be considered for employment. Much of the success aides have experienced is due to their knowledge of the children's life out of school; they understand the children's background and children sometimes find it easier to identify with and talk to an aide rather than the teacher.

Title I can also cover the cost of training teachers and aides who will participate in the title I program. Title I requires that such training—whether preservice or inservice—"be of sufficient size and depth to

have an impact on the participant and the title I program." In other words, one day is usually not enough time to acquaint new teachers and aides with the problems of students participating in a title I project and the objectives of the project. Colleges and universities in or near a title I area should be contacted for help in planning a training program. Local and State personnel who work with the target population can also serve as resource persons.

Title I also requires that teachers and aides be trained together. This encourages closer cooperation among the professional staff members and their aides. Title I urges school districts to provide aides with training that will lead toward teacher certification. Parents should know what type of training is available to both teachers and aides as part of the title I program and should encourage interested parents to apply for positions as aides.

Another form of teaching assistance common in title I projects is tutorial systems. Tutors, either adults or older students, help children, particularly in reading and math. A tutor usually works with just one or two children. He sometimes accomplishes more simply because the child does not see his tutor as a "teacher." A side effect is that the tutors themselves often learn more.

OTHER INSTRUCTIONAL SERVICES

There are other instructional services not directly related to teaching which can be part of a title I program. Some will not cost any money; others may be a major expenditure.

To get children interested in some subject, school officials may invite some member of the community who uses knowledge of the subject in his job to visit the classroom. For example, a banker might talk about the importance of knowing how to balance a checkbook; the druggist might bring a few chemicals to conduct an experiment in a science class; a storekeeper could explain addition by talking about buying and paying for items in a store; a butcher may get children interested in weights and measures by showing how he uses the scale in his store. Most of these people will volunteer their services to the schools if asked, yet they are an asset to the title I—and the regular school—program.

Other services will cost money. Some school districts use title I money for special work-study programs which help point out the importance of education to educationally deprived teenagers.

Title I sometimes covers the cost of a summer school

program. Although children may not need to enroll in the regular summer school to make up work in a subject they missed or failed, they may need help to retain and reemphasize material learned during the regular school term. Title I can pay for both teacher salaries and other expenses of such a summer project.

The variety of instructional services is endless. Some will be discussed under equipment and supplies; others are mentioned as examples elsewhere in this book. Parents should know exactly what instructional services are available to children through their district's title I program and should work with school officials to decide whether these services help correct the children's learning problems.

SUPPORTIVE SERVICES

While certain things, such as medical and dental treatment, clothing, and transportation, are obviously not directly a part of an educational program, educators generally agree these services are supportive. Arguments start when guidance and counseling, field trips, and job placement are considered. Some school officials feel such services are instructional because they may be offered within a school as part of the school program. Others argue that these services are not essential to academic learning and therefore are supportive.

In a sense there is no need to argue the point. Whether these services are instructional or supportive, a needs assessment should show if they must be available for a child to learn. For instance, a teenager may take no interest in school and drop out without the incentive of a work-study program; such a program involves job placement. Children in an isolated rural community who have never been in a restaurant, visited a zoo, or seen a factory may have difficulty reading because they have no idea what words like cafeteria, waitress, zebra, or penguin mean. City children may never have seen a cow or a pig. Field trips are one way to help children improve their vocabulary.

Since title I is an educational program, it has two conditions which must be met before supportive services can be paid for with title I money:

1. The services are not available from any other source.
2. The services are an important part of the title I educational program.

The first point is pretty clear. Title I should not provide lunches if the school district already has a hot lunch program funded by the U.S. Department

of Agriculture. Title I should not buy eyeglasses for children if the local Lion's Club will do this. Title I should not pay for medical exams for children who can receive the exams free as part of the local welfare program. Other sources of services will be discussed later.

For services to be an integral part of a title I educational program, they must be related to an educational need and result in educational improvement. For instance, a young child may not be able to concentrate in school if he has not had breakfast; for him to learn, title I may need to provide a good breakfast. Or children in isolated rural areas may be unable to attend remedial reading classes because they have no way to get there; title I can pay for the cost of transportation.

Only children participating in a title I educational program may receive supportive services paid for under title I. For instance, an eligible child may not get breakfast under title I if he is not getting some sort of instruction as part of a title I program. And not every child in a title I program will need supportive services. Such services should be provided on an individual basis; those children who need extra help should get it.

Where To Get More Help

Every time title I money is spent on supportive services there is less money to be spent on education. Title I funds can be spent on nearly anything that will help children do better in school. But instead of spending this money on food, doctors, or clothing, school officials and parents should try to get other organizations to provide these services. Following is a list of agencies that provide help to needy children and their families:

- Aid to Families With Dependent Children
- Chamber of Commerce
- Child Guidance Clinic
- Community Action Agency
- Comprehensive Community Health Center
- Community Coordinated Child-Care Centers
- Community Mental Health Center
- Dental Association
- Elk's Club
- Family Service Society
- Follow Through
- Food Stamp program
- Foster Grandparents
- Head Start
- Job Corps
- Junior Achievement
- Legal Aid Society
- Lion's Club
- Local Hospitals

- Local Libraries
- Medicaid
- Medical Associations
- Model Cities
- NAACP
- National Dairy Council
- National Welfare Rights Organization
- Neighborhood Youth Corps
- Public Housing Authority
- Red Cross
- Salvation Army
- Society for the Prevention of Blindness
- Teacher Corps
- United Fund Agencies
- Urban League
- Visiting Nurses Association
- YMCA
- YWCA

Most school districts also get a number of other Federal funds which can be used to provide services to title I children. Under other titles of the Elementary and Secondary Education Act funds are available to buy books and provide library services, try innovative projects, plan programs for bilingual students, and operate special projects for dropouts. The U.S. Department of Agriculture gives money to school districts to provide free or reduced price lunch and breakfast programs for needy children. There are other Federal funds, too. Parents should talk to local representatives of national programs and write their congressmen to find out what help title I children can receive.

A number of States fund their own compensatory education programs. These can be used to serve more children than title I alone might be able to reach or to provide more services to children already receiving help under title I. Parents and school officials should also look at other State programs—health, employment, or education—which might be of help to title I children.

There are many nongovernmental resources at the local level beyond the agencies listed on the previous pages. Universities and colleges may have special clinics title I children can use; students can act as aides or tutors in title I schools; professors are always good for ideas on where other help can be found. Local businesses and industries may offer their own community help programs. And community service agencies—the welfare department, police and fire departments, and the health department—have a variety of services for all residents. Parents should know what these services are and be sure the title I program takes advantage of them.

The important thing to remember about all these sources of help is to make the fullest possible use of

them. Planning for a title I program should include consideration of all local, State, Federal, and private programs which can provide more services for title I children. Title I funds should be used primarily for education and for supportive services only when no other sources can provide such help.

Supportive Services for Migrant Children

Migrant families (see page 14) most often do not meet the residency requirements of State and local health and welfare programs. Most communities require citizens to live there a minimum of 6 months to receive the benefits of such programs. But migrant children and their families are often in one State for only weeks at a time. Therefore, they cannot get the benefits of such programs and extra services. Title I may have to pay for such things as medical and dental care, food programs, and day-care services.

However, there is another source of money to help these migrant families--title III of the Economic Opportunity Act of 1964. Part B of this law provides special help for migrants, and school officials planning a title I program should know about this law and make sure its benefits are used.

EQUIPMENT AND CONSTRUCTION

Title I includes some special rules for projects using title I money to buy equipment or build or remodel buildings. This use of title I money occurred more in the first years of the program than it has in recent years.

In 1968 the U.S. Office of Education issued Program Guide No. 44. This directive included the following recommendations:

1. Expenditures for equipment will be limited to the minimum required to implement approved title I activities or services.

2. Title I funds will be used for construction only when necessary to implement projects designed to meet the highest priority needs of educationally deprived children.

The word equipment should not be confused with supplies. *Supplies* are consumable goods; that is, materials that once used must be frequently replaced. They are not meant to last for long periods of time. Most school programs use a large number of supplies, such as crayons and pencils, workbooks, et cetera. *Equipment*, on the other hand, is more expensive

Use this space to list other sources of help within your community.

and is meant to last for a longer time. Some examples of equipment commonly found in schools are television sets, film and slide projectors, overhead or opaque projectors, tape recorders and earphones, and Language Masters. The law defines equipment as including "machinery, utilities, and built-in equipment and any enclosures or structures to house them, and includes all other items necessary for the functioning of a particular facility as a facility for the provision of educational services, including such items as instructional equipment and necessary furniture, printed, published, and audiovisual instructional materials, and books, periodicals, documents, and other related materials."

Program Guide No. 44 includes other suggestions relating to equipment:

1. The title I program, as planned, requires the use of certain equipment. For instance school officials may agree a reading lab, where children can work on their reading problems individually and at their own pace, is the best way of solving the children's reading problems. To organize such a lab, they will need to buy tape recorders, earphones, a monitoring system, etc. Such equipment is necessary to carry out the title I project.

2. The school district does not have such equipment now, either for its regular school program or for other title I projects.

3. The school district has staff members who can (or will be trained) to use the equipment. This is especially important because some of the new teaching machines are complicated and repairs are costly.

There are special problems about the use of equipment in title I projects involving children from nonpublic schools, especially when such projects operate on private property. The public school district owns all equipment purchased with title I money. It may put the equipment in a nonpublic school for use in a title I project, but the nonpublic school may not keep the equipment or even use it for regular classes. Any equipment used for a title I project in a nonpublic school must be mobile or portable so it can be removed or carried away; it cannot be equipment built into the school. And public school officials must keep track of all equipment being used in nonpublic schools; they promise to do this in their title I application.

Although the rule about construction cited in Program Guide No. 44 indicates title I money can be used for this purpose, Federal officials discourage this use. Rather than building new facilities to house title I activities, the Federal Government recommends

that the school district rent classroom space or use mobile classrooms.

The law defines construction as "the preparation of drawings and specifications for school facilities: erecting, building, acquiring, altering, remodeling, improving, or extending school facilities . . ." To use title I money for construction, the school district must show in its application that there is no good place available to bring children together for a title I project and that the school district cannot pay for construction. In the few cases where construction is approved, the school district must promise to begin and complete the building in a reasonable period of time, to pay laborers the going rate for their work, and to follow the Secretary of Labor's guidelines on construction using Federal funds.

Among the things the Secretary of Labor requires are:

1. Firms hired to do the construction (the contractors) may not discriminate in their employment practices. In other words, they must give qualified blacks, Puerto Ricans, and other minority members an equal chance to do the job.

2. There must be open competitive bidding for the construction. This means that any firm which wants to must be given a chance to estimate the cost of construction. Usually the firm with the lowest estimate will get the contract.

3. Whatever is built must be functional and economical; not extravagant and elaborate.

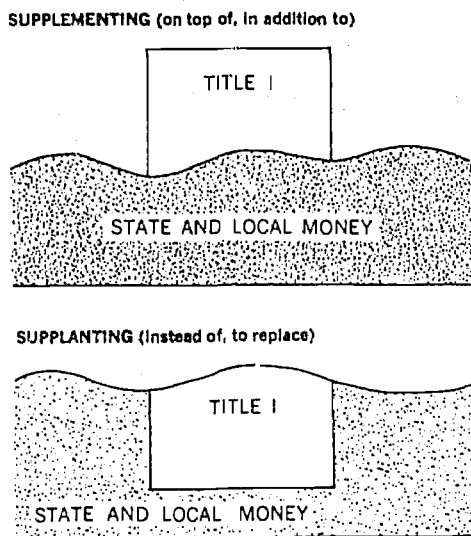
COMPARABLE SERVICES

No matter what services a title I program provides for educationally deprived children, they will not be enough to help these children overcome their learning problems if they are not *extra* services. Title I funds are meant to be used in addition to State and local funds, not instead of them.

This was always the intent of title I, but because some schools usually received less services from State and local funds than other schools in the same district, the Federal Government has made its rules on providing equal or similar services to children in title I and nontitle I schools stronger and more clear.

The first regulations issued about title I stated that this Federal money should be used to supplement and not supplant State and local funds. *Supplement* means on top of or in addition to; *supplant* means to replace or instead of. Figure 1 illustrates the meaning of these words.

FIGURE 1.—The Meaning of Supplementing vs. Supplanting.



In 1970 Congress took another step toward equalizing services by making *comparability* part of the title I law. Public Law 91-230 says State and local funds will be used in each school district receiving title I money "to provide services in (title I) project areas which, taken as a whole, are at least comparable to services being provided in areas in such district which are not receiving funds under this title (I). "Beginning July 1, 1972, a school district which could not prove it was offering comparable services to children in title I and nontitle I schools could not get title I money.

School districts must show whether services provided with State and local money are comparable in title I and nontitle I schools. They are comparable if:

1. The number of children enrolled per instructional staff member (including both certified and non-certified personnel) for each title I school is not more than 105 percent of the average number of children per instructional staff member in the entire district. Instructional staff members include teachers, principals, librarians, guidance counselors, and aides, and
2. The amount of State and local money spent on each child enrolled in a title I school is not less than 95 percent of the money spent per child in all nontitle I schools in the district.

If a school district has even one school that is not comparable on either of the above criteria, it must collect and report data on instructional materials and supplies for the entire school district. Each title I school must then be comparable on all three

criteria: ratio of pupils to instructional staff, per-pupil expense for instructional salaries, and per-pupil expense for instructional materials and supplies.

School districts must compare the schools in a maximum of four groups—elementary, junior high, high school, and schools serving nine or more grade levels above kindergarten.

Table 1 is a checklist parents can use to determine if their school district offers comparable services to title I and nontitle I schools. School officials should provide parents with the data needed.

A separate checklist should be filled out for *each* title I school. The data should be easy to get because school districts have to submit them to the State education agency by midyear. These data must be broken down for schools serving the same grade levels; for instance, elementary schools should be compared with each other. It would be unfair to compare the average per-pupil expenditure of an elementary and secondary school.

The comparability law allows some differences among schools because it is impossible to keep everything absolutely equal. It does not say that every school must offer the same services; one school may need a remedial reading teacher while a bilingual teacher may be more important in a second school. The law does not say that every school has to use the same kinds of books or the same amount of supplies. What the law does say is that every school must get its fair share of State and local funds for education. In one school district, the Office of Education found the average amount spent on each student in a nontitle I elementary school was \$495. In a title I elementary school in the same district the average expenditure for each child was \$295. That is not fair. No matter how much help title I is able to give needy children in the second school, it will only make up for what children in the first school already get. There is nothing *extra*, and the whole purpose of title I is to provide extra services for educationally deprived children.

Parents and other citizens pay the State and local taxes used for the schools. They should be sure the schools their children attend get as big a share of this tax money as other schools in the district. If they do not, parents should complain to the State education agency.

The State has a number of responsibilities concerning comparability. It must:

1. Develop additional comparability criteria where appropriate. For instance, although the Office of Education requires comparability only of instruc-

tional services, a State may require comparability of supportive services as well.

2. Require and study comparability data and plans submitted by local school districts.

3. Require that local school districts promise to maintain comparability.

4. Temporarily withhold the approval of a title I application or the payment of title I funds to a

school district which does not meet the comparability criteria.

5. Monitor local school districts to be sure comparability data are accurate.

6. Submit reports on comparability to the Office of Education as requested.

7. Check into parents' complaints about a lack of comparability between title I and nontitle I schools.

TABLE 1.—Checklist for Parents To See if Their School District Offers Comparable Services to Title I and Nontitle I Schools

(DO NOT INCLUDE STAFF MEMBERS WHOSE SALARIES ARE PAID WITH FEDERAL MONEY)

School district grade span of schools listed

Data	Title I school	Average for non-title I schools
1. Number of pupils enrolled		
2. Number full-time instructional staff		
*3. Ratio of pupils to full-time instructional staff (divide #1 by #2)		
4. Amount spent on instructional salaries		
5. Amount spent on instructional salaries (not including seniority pay)		
*6. Per-pupil expense for instructional salaries (divide #5 by #1)		
7. Total expense for instructional materials and supplies		
**8. Per-pupil expense for instructional materials and supplies (divide #7 by #1)		

* These are the criteria necessary to decide if your district meets the Office of Education's comparability requirement. Remember, there may be a 5-percent variation.

** This criterion applies only to districts that have one or more schools not comparable on either #3 or #6.

APPLYING FOR TITLE I FUNDS

Before the SEA gives title I money to a local school district, it must approve the district's title I application. The application is a legal document outlining how the district planned its title I program and how that program will be operated. A school district must submit a new title I application each year. Each State designs its own application, but certain items must be included. They are:

1. Evidence of *maintenance of effort*. In other words, a school district must prove that it is continuing to support title I schools with State and local funds as much as it did before title I money was available.

2. Data indicating children in title I schools receive their fair share of services and staff provided with State and local money. (See pages 8-10 for a discussion of *comparability*.)

3. Data to support the selection of *eligible attendance areas*, that is, those areas with higher numbers or percentages of children from low-income families than the LEA average. (See page 62.)

4. Needs assessment data. (See page 16.)

5. Description of the involvement of nonpublic school children. (See pages 15-16.)

6. Description of parental involvement. (See pages 21-25.)

7. Description of the project. This should include a title for each project, an explanation of the educational problems to be solved, how participants were selected, objectives for the project which can be measured in terms of student performance, a description of how the project will operate, an evaluation design, plans for inservice training of staff members, and an itemized budget. A district's title I program may include several projects.

8. Plans for disseminating information about the title I program. This includes keeping staff members, parents, the general public, and State and Federal officials informed about title I activities.

9. Budget summary.

10. Equipment inventory. This is especially important in school districts where some title I activities will be held at desegregated private schools.

The LEA must also promise in the application to control all title I funds, to own all equipment purchased with title I money, to submit an annual report and any other reports requested to the SEA, and to prevent discrimination in title I activities.

Thus, although the application is part of the funding process, it is also an essential element in the

planning and operation of a title I program. The SEA not only uses the application to determine if a school district receives title I funds, it also uses the application to monitor local title I activities; that is, to be sure the program is operating as it was planned.

Each member of a parent advisory council should receive a *free copy* of a district's title I application before it is forwarded to the SEA. This should be done in plenty of time to allow council members to comment on the application. In addition, anyone else who wants to see the application should be given the opportunity to do so. Parents' comments, if not included in the application, should be sent to the SEA along with the application.

In examining a title I application, parents should consider at least the following questions:

1. What information was used to select attendance areas where title I services would be offered? Are these data the best indicators of where the most needy children live and attend school?

2. Did the school district officials consult parents and community agencies serving the target area about the needs of eligible children?

3. What criteria were used to consider who of the eligible children would actually participate in the title I program?

4. Could any other State or local agency, either private or public, provide any of the services included in the title I program?

5. Do schools with title I services receive the same amounts of State and local assistance as nontitle I schools in the district?

6. Who designed the title I program? How were parents involved?

7. Can the goals of the program be measured objectively?

8. Are any noninstructional activities included in the program? If so, will they have a direct bearing on educational performance?

9. Does the title I program differ from the regular school program? Are they complementary?

10. Are teachers and teacher aides trained together? Is their training adequate?

11. Are nonpublic school children going to participate in the program?

12. How much information do parents have about title I activities in the district?

SEA staff members will be asking themselves many of these same questions in examining local title I applications. Parents might also find it helpful to read *Reviewing Project Applications*, a handbook written especially for SEA staff members.

Whom Can Title I Help?

The question of whom title I can help is complicated by the use of different criteria for the selection of schools which will participate in the title I program and children who will actually receive title I services. The selection of participating schools, as discussed on pages 59 to 64, is based on the number or percentage of poor children living in the neighborhood served by certain schools. Once some schools within a district have been chosen as title I schools, the only criteria for participation of children are that: (1) They reside in an attendance area served by a title I school; and (2) they be educationally deprived. An educationally deprived child is one who is behind in school. He (she) needs special instructional help to perform at the grade level appropriate for his age. The children's special educational needs may result from poverty, neglect, delinquency, physical handicaps, or cultural, economic, ethnic, or linguistic differences from the traditional student body.

Thus, participation in title I programs is *not* restricted to poor children, although the selection of participating schools, based on low-income factors, insures that a large number of participants will be poor.

In considering whom title I can help, it is important to realize that there are many more children who need and are eligible for title I services than most school districts can serve. Therefore, districts must concentrate their funds on the most educationally needy children. This principal of *concentration* will be discussed more thoroughly in this chapter.

There are special categories of children to be considered for title I services. Children in institutions for the neglected, delinquent, or handicapped, migrant children, Indian children, and children attending nonpublic schools are all eligible for title I services, but their participation in title I programs involves certain problems this chapter will cover in greater depth.

GENERAL ELIGIBILITY OF CHILDREN

The statement of purpose for title I, contained in Public Law 89-10, makes it clear that the program was meant to serve all educationally deprived children living in low-income areas: "To provide financial assistance to local educational agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means which contribute particularly to meeting the special educational needs of educationally deprived children."

Basically, there are two criteria a child must meet to participate in a title I program:

1. He must live in the title I target area. This does not mean he must attend the public school where title I services may be offered; but he must be a resident of the area served by the public school.
2. He must be educationally deprived. Most school districts consider a child educationally deprived if he is performing below the expected grade level for his age group. For instance: a 6-year-old should be doing first-grade work; a 9-year-old, fourth-grade work.

Like all federally financed projects, title I forbids discrimination against any child because of race, color, sex, or national origin. The application submitted by each local school district must include an Assurance of Compliance with title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination in any activity receiving Federal aid.

In counting children in order to determine a school district's title I grant, only children aged 5 through 17 are included. However, children below age 5 and above age 17 may receive title I services; any educationally deprived student in an elementary or secondary school with a title I program may receive title I help. For instance, a school district may organize a title I project for preschool children or fund a dropout prevention project for youths up to the age limit

prescribed by the State for receiving free public education.

SPECIAL CATEGORIES OF ELIGIBLE CHILDREN

Soon after title I became law, it was amended to include aid for handicapped children living in State-operated institutions. A year later Indian and migrant children and children living in State or local institutions for the neglected or delinquent also became eligible for title I services. Parents of these children should also be involved in title I activities.

Indian Children

The title I program for Indian children living on Government reservations is run by the Bureau of Indian Affairs (BIA), a part of the U.S. Department of the Interior. The BIA acts as a State education agency in supervising the title I program. It approves the title I applications of BIA schools, monitors the title I programs, and handles complaints related to the program.

The BIA has signed a memorandum of understanding with the U.S. Office of Education agreeing to obey all title I rules. Every parent council at a BIA school and every head of a school should have a copy of this memorandum.

The title I program for Indian children should not be very different from any other title I program in terms of its administration because it must still follow all Federal laws and regulations. It must involve parents, study the needs of eligible children, plan projects to meet those needs, and include a detailed budget.

But a program for Indian children *should* differ from other title I programs in content. It should consider the different cultural and sometimes linguistic background of the students. It must examine the limited environment of the reservation and consider the necessity of planning field trips to expose students to different educational experiences.

School districts with Indian populations must be sure the parents of Indian children eligible to receive title I services are represented on the district's parent advisory council.

Parents of children attending Federal schools on Indian reservations are usually close because they live on the reservation year-round. However, parents of children attending BIA schools away from home will find it harder to become involved in title I activities. Nevertheless, their opinions must be considered in planning the title I program.

Many Indian children no longer live on reservations but have moved with their parents to large urban areas. If these children live in an attendance area where title I services are available, their special needs should be examined in planning the local title I program.

Migrant Children

A *migrant child* is one who has moved with his family from one school district to another during the past year because a parent or other member of the family picks crops or works in other food processing activities. By law, a child is considered a migrant up to 5 years after his family has left the migrant stream.

There are two types of migrant children—interstate and intrastate. An *interstate migrant child* is one who within a year's time moves from one State to another with his family to find agricultural work. An *intrastate migrant child* moves to another school district but stays within the same State. Both intrastate and interstate migrant children are eligible for title I services.

Most States have a large population of migrants for only 1 to 4 months each year, during harvest season. In these areas the involvement of the migrant children in regular title I activities is not always feasible, but there should always be a State-operated migrant program to assist them.

Three States—California, Florida, and Texas—have large migrant populations for most of the year, so there is a real need to look at the special educational problems of these migrant children in their home base setting. They may not only receive title I services under the special grant made to each State education agency for migrant education but also are eligible to participate in local title I activities if they are educationally deprived. Their needs, including remedial help, bilingual instruction, prevocational training and counseling, and preschool, should be considered in planning the local title I program in the districts where they live for most of the school year.

Local parent advisory councils in these States should make a special effort to have migrant parents represented on the local councils. Local parent councils in other States where migrants live only a short time can involve migrant parents in several ways. Council members and local school officials may talk with the parents to get a better understanding of their children's educational problems and needs for future planning of title I programs. Council members can tell them about what title I and other

community services are available and encourage them to attend the council meetings.

The title I program serves nearly 250,000 migrant children each year, but there are still thousands of such children who are not receiving special educational help. Parents should make a special effort to see that migrant children receive services under the Provisions of the Migrant Program and, where possible, are included in all title I activities of the school district.

Children in State Institutions

All children living in State institutions for the handicapped, neglected, or delinquent and participating in an elementary or secondary education program are eligible for title I services. The State education agency (SEA) receives separate allocations for handicapped children and neglected or delinquent children in State-operated institutions. The SEA then grants this money to the State agency responsible for the administration of such institutions when its project application is approved; this State agency acts as a local school district in planning title I programs to meet the needs of institutionalized children.

The biggest problem in planning programs for institutionalized children is to attempt to serve all children in the institution. This usually means that only a few dollars are available for special aid to any one child, not enough to make a difference in educational performance. Parents of institutionalized children should find out what percent of the children in an institution are being served by title I, how many title I dollars are used for each participating child, and what effect this money is having on educational achievement.

Children in locally operated institutions for the neglected or delinquent should be helped as part of the local school district's title I program. Since their problems are likely to be different from those of children attending regular schools, special attention should be given to discovering their needs.

Because children in institutions are away from home, it is hard for their parents to be involved in school activities. In many cases, these children are wards of the State, and contact with the parents is minimal. However, there are things that can be done to involve these parents. For example, when parents visit their children, title I staff members should try to explain the title I program to them, ask their opinions of it, and find out what they feel are their children's greatest needs. If talking with parents is impossible, the title I staff should try to find out as

much as possible about the children's home environments by talking with caseworkers, examining records. This is a necessary part of the needs assessment, and would also be helpful in determining whether family influence would affect academic achievement.

Contact with the parents will be particularly important when institutionalized children return home. Many of them will be eligible for title I services in their local schools, but their needs may be different from those of other children. Parents can help teachers and administrators understand their children's readjustment problems, alert them to particular needs the institution may have noticed, and help plan a school program which appeals to the child. Foster parents can fill this same role.

ELIGIBILITY OF NONPUBLIC SCHOOL CHILDREN

Title I funds may *not* go directly to any nonpublic school. However, children attending desegregated nonpublic schools may receive title I services. In fact, title I requires that such children—if they live in an eligible attendance area and are educationally deprived—be given “genuine opportunities” to participate in the title I program. Thus, the requirements for children attending nonpublic schools are the same as those for children in public schools:

1. They must be educationally deprived.
2. They must live in a title I target area.

Most school districts have rules saying that children living in a certain area must attend a certain school; these areas are called school attendance areas (see page 59). All children thus live in some school attendance area. If the area they live in is picked as a title I target area, then children in that area who are educationally deprived may participate in the title I program, whether or not they attend the public school.

Some school districts have a “freedom of choice” plan which allows a child to attend any school he chooses. There are no exact attendance areas based on neighborhood boundaries. In such cases it is hard to determine what public school children from nonpublic schools might attend, and title I planners must establish rules for determining which nonpublic school children are eligible for title I services. Parents should know what these rules are.

Some nonpublic school children who live in one school district attend a nonpublic school in another district. If they live in a title I target area and are educationally deprived, these children are still eligible

for title I services. Planners from both school districts must get together to be sure such children receive help.

School districts must spell out their plans for including nonpublic school children in the title I program in their title I application. They must know:

1. What arrangements have been made to include nonpublic school children.
2. The number of eligible nonpublic school children who will participate in the title I program.
3. How these children will receive services.

Because most school districts have little information about children attending nonpublic schools in the district, teachers and principals from nonpublic schools must be asked to determine what children need help and what types of help are needed most. Parents of nonpublic school children should also be consulted.

Federal regulations for title I require that all eligible children whether they attend public or private schools, receive comparable services under title I. This does not mean that all children will receive the *same* services. If the public school system offers a good remedial reading program, there is no need for the title I program to duplicate it. However, children attending nonpublic schools may not have access to a remedial reading program and that may be their greatest need. The school district may offer a title I remedial reading program for nonpublic school children and a remedial math program for public school children. Such services are comparable. Offering a comprehensive remedial math program for public school children and a few field trips for nonpublic school children would not be comparable.

The Federal regulations saying nonpublic school children must be given "genuine opportunities" to participate in title I programs also means they must have a real chance to make use of the services. For instance, projects should not be planned at times and places that would make it impossible for nonpublic school children to attend.

It is not enough to say that enrollment in title I programs is "open" to nonpublic school children or that provisions are being made to include nonpublic school children. A school district must spell out in its application exactly how these children will receive title I services. Some of the most common methods used are:

1. *Dual enrollment.* Under this method the nonpublic school children attend public schools part time to take part in special projects or activities.
2. *Shared services.* In this method the public school system shares its title I staff and/or equipment with

title I children attending desegregated nonpublic schools. A public school teacher or special personnel, e.g., speech therapist or guidance counselor, may work with children in the nonpublic school.

3. *Mobile services.* The school district may use a mobile unit, equipped with special materials and personnel, to provide title I services to public and nonpublic school children. In this way, the public school employees are not teaching on private school property.

Parents will find it helpful to read the Office of Education's Handbook on the Participation of Nonpublic School Children in title I ESEA for a more in-depth view of this part of title I.

FINDING OUT WHAT ELIGIBLE CHILDREN NEED

It is not enough to know which children are eligible to receive help with title I funds. For a title I program to be successful, planners (including parents) must know what kinds of problems the children have, which children have which problems, what can help correct the problems, and which problems must be dealt with first. This process is called a *needs assessment*.

The law implies that each school district will do a needs assessment—

to expand and improve their educational programs by various means (including preschool programs) which contribute particularly to meeting the special educational needs of educationally deprived children.

That's why in outlining the steps to be completed in designing a title I program, Federal officials specifically required a needs assessment in each school district's title I application. The criteria for title I include:

The application shows that the title I program is based on a consideration of the relative needs of children at all ages and grade levels and is designed to meet a limited number of high priority needs which cannot be met through the regular school program or other programs.

Five steps make up the needs assessment process:

1. Identifying the educationally deprived children in an eligible attendance area.
2. Gathering information to determine what types of educational help these children need.
3. Diagnosing what the children's educational problems are.
4. Classifying the needs of the children; i.e., determining if their needs are academic, motivational, medical, etc.
5. Establishing priorities for the order in which needs will be met.

Identifying Educationally Deprived Children

The previous sections in this chapter talked about the eligibility requirements for children participating in title I programs. One of the criteria was always that the child be educationally deprived, no matter what the cause of that deprivation. To identify which children are educationally deprived, the school district must decide how to judge educational deprivation. The most common standard is grade-level achievement; a child who does not do the work expected of a student his age and in his grade is considered educationally deprived.

To determine which children are not performing as well as their classmates, a school district can use a number of sources, including achievement records, reading levels, and standardized tests.

The school district should choose one of these sources as a "key indicator," or the most important guide in the selection of children with learning problems, and apply it to children at all ages and grade levels. For instance, the key indicator may be reading levels. For children in grades 1 and 2, anyone reading 6 months or more below the classroom would be considered educationally deprived; in grades 3 to 6, the criteria might be 1 year below grade level; in grades 7 to 12, 2 or more years. While the degree of difference between the norm and the performance level of an educationally deprived child may change, the indicator—reading level—remains the same.

Collecting Data on the Children

Knowing that a child is educationally deprived does not tell program planners anything about the child's learning problems, the causes of those problems, or his needs. At this point, it is necessary to consider the child as an individual, not as part of a group. For instance, a first grader's problems and needs are different from a ninth grader's; a Spanish-speaking child has problems in school an English-speaking child does not have; institutionalized children may have different problems than children who live at home.

The school should gather both objective and subjective information on educationally deprived children. The objective data will include academic, health, and attendance records and information about the child's family, their income, his neighborhood, et cetera. The subjective data usually comes from talking with persons who know the child—teachers, parents, social workers, neighbors, doctors and nurses, and others in the community. Parents should be sure their opinion is concerned in determining the problems and needs of their children.

In large urban school districts it may be difficult to gather information on each educationally deprived student without a computer. However, each child's school records should give some indication of his educational needs. In such cases, parents should make sure that individual children with problems similar to those of other children are studied as part of the needs assessment.

Diagnosing Educational Problems

The data will give title I program planners a good indication of what a child's problems are and the causes of such problems. For instance, school records may show a child has difficulty reading. In talking with the mother, a school official may find out the child often falls over things, misjudges distances, and so forth. Then a doctor may confirm that the child needs glasses and probably can't read without them.

In pinpointing a child's educational problems and what causes them, the parent council and school officials must think about the child's academic skills (reading, vocabulary, listening, speaking, arithmetic), his attitude toward school, his motivation, his physical and mental health. They must compare the child's progress in these areas with the average for his age and grade level.

Classifying the Needs of the Children

In classifying the needs of educationally deprived children, it is necessary to consider different groups of children. School officials should list the needs of pre-school children, children in grades one to three, children in grades four to six, junior high school students, dropouts, and senior high school students. Within each of these groups, there are special groups of children whose needs must be considered—Spanish-speaking children, nonpublic school children, migrant children, and handicapped children.

Establishing Priorities

The previous sections in this chapter talked about eligible children, but there are always more eligible children than the district can serve with its title I money. So title I funds are used to help the most needy of the eligible children; this is called *concentration*.

Concentration insures that title I funds are not spread so thin that they do not make a difference: ideally each title I project should set aside at least \$200 for each participating student. This money is above and beyond the money spent on the child as

a part of the regular school program. Of course, the dollar amount will vary considerably from State to State. States with their own compensatory education program may be able to serve more children (with lower per-pupil expenditure) under title I because the State provides extra services. Education costs, such as teacher salaries, school construction, and transportation, will be lower in some States than in others. But each State must be sure its local school districts concentrate their title I funds enough to be sure the money has a positive effect on student achievement.

In order to concentrate its title I money on a limited number of the eligible students, a school district must establish priorities for the use of title I funds. Some States have set priorities for their school districts by limiting the use of title I funds to elementary schools; this means the needs of students in grades 7 to 12 are not even considered in the needs assessment.

First priority should be given to the most widespread and most serious problem discovered in the needs assessment. In many school districts this will be reading. But reading is still a very broad priority, and a school district may not have enough title I funds to help all children with reading problems. Therefore, it may set first priority on preschool reading readiness and helping children in the early elementary grades with reading problems.

Once these priorities have been established, a school district begins to plan how the most important needs of this limited number of children can be met.

But before dealing with that question, *parents* should examine the entire needs assessment process to be sure the children the title I program will serve are the most needy and that their problems can be solved. Parents must ask:

1. What was the "key indicator" used in identifying educationally deprived children? Is this the best indicator?

2. Were the needs of special categories of children; e.g., Spanish-speaking, migrant, handicapped, drop-outs, etc., considered?

3. Were parents asked what they thought the children's needs were? Were other members of the community asked?

4. How many children in the target area are educationally deprived? How many will actually participate in the title I program? Is this too many? Too few?

5. Did school officials consult representatives of nonpublic schools?

6. How did the school district decide which were the worst educational problems of the children and what help the children needed most?

7. Do parents and teachers agree that this is the worst educational problem?

What Can (and Should) Parents and Private Citizens Do Under Title I ESEA?

This entire book is for the parents of title I children, explaining the program to them and pointing out certain areas they should be particularly concerned with. This chapter deals with parental involvement more directly—what the law says about involving parents and other citizens in the title I program, the purpose of parent advisory councils, and the ways in which parents and other community members can get involved in school activities.

Parental involvement is nothing new in title I. Within a year of the time title I programs first started in 1965, Public Law 89-750 amended title I by requiring school officials to work with local community action groups in developing and operating title I projects. These groups often included the parents of title I children.

When the revised criteria (Program Guide No. 44) were issued for title I, they included a number of recommendations concerning parents and other community members. For instance:

1. School officials should talk with parents in determining the most important needs of children eligible to receive help under title I.
2. Parents and other qualified community members should be considered for job openings in the title I program.
3. The title I program should include activities and services which will involve parents.
4. Both parents and other interested citizens should be kept informed about the title I program.

On July 2, 1968, Program Guide No. 46 suggested that local school districts establish advisory councils for title I. Three years later districtwide parent advisory councils became a requirement for title I, and the Office of Education asked that separate councils be formed in each school with a title I project. The new regulations on parental involvement, requiring *parent councils*, replaced Program Guide No. 46.

This chapter examines the types of parental involvement, concentrating on the role of the parent advisory council. Parents will also want to read *Parental Involvement*, a guide for State and local school officials published by the Office of Education. It explains the duties of the State and local education agencies in regard to parental involvement. The Head Start workbook, also called *Parental Involvement*, offers suggestions on activities for parents, the organization of parent groups, and tips on planning and conducting meetings. The workbook should be available from local Head Start projects or the Office of Child Development, 400 Sixth Street SW., Washington, D.C. 20013.

THE ROLE OF PARENTS IN TITLE I PROGRAMS

There are many ways in which parents and other citizens can become involved in title I and other school activities. This chapter describes just a few of them.

Parents as Community Members

Parents of school-age children probably know more about what is going on in the schools than other citizens. As taxpayers, they are concerned with how their tax money is being spent. They should make their views known when the school district asks for more money or when there are school board elections. Their opinions, because they are more closely involved with the schools, are likely to influence the votes of other community members.

Other citizens come in contact with the schools by living near them, by hiring a student, or just by reading about them in the papers. Their impressions may be good or bad, depending on their experiences. Parents, especially those who are really involved in school activities, can help improve school-community

relationships. They understand their neighbors' attitudes but, at the same time, know what problems the schools have.

Parents as Helpers

Parents and other citizens have many talents. They should work with title I staff members in using these talents to help the schools. There are some salaried positions in most school districts which parents may fill. Of course, the first to come to mind is the teacher aide.

Title I funds pay the salaries of many aides throughout the country. Title I aides, however, can be used only under certain conditions. Their services must be given only to those children who are identified and who are receiving title I services. Therefore, they can be assigned only to teachers paid by title I funds and who are serving this special group of students. The aides have been successful in helping lessen the amount of teachers' paperwork, in giving more individual attention to children, and in gaining the confidence of children from backgrounds like those of the aides. In fact, title I aides have been so successful that many school districts now hire more aides with their own money. Title I funds may pay the salaries of aides if their services are needed in the title I program and if the school district does not have similar aides in nontitle I schools whose salaries are paid with local funds.

There may be other jobs that community members would be best suited for. Albuquerque, N. Mex., hired a number of citizens to administer a simple Language Dominance Test. After evaluators trained them for several hours, they went into the homes of school children to find out how much Spanish or English was spoken in the home. This helped school officials decide how much bilingual instruction students would need.

Parents are most often seen in the schools in a volunteer role. They may offer to supervise field trips for the children. They may help keep order in the lunchroom and on the playground. They may prepare snacks occasionally. They may give a demonstration that is tied in to a classroom lesson. For instance, a meter man for the gas or electric company might explain his job as a way of showing children the importance of arithmetic. The local weatherman could be invited to talk to a science class. A news reporter could give an English lesson to older students.

Of course, the traditional bodies, such as the parent-teacher associations and the home and school

associations, are still active in many places. They give the schools both financial and personal help.

Parents as Observers

As parents become more involved in title I, they will want to know more about the program. Parents can visit classrooms for firsthand information, talk with teachers, principals, and school officials, and exchange ideas with other parents. Parents may want to read through a district's title I files. (These should be open to the public.) Title I rules require that parents be given an opportunity to look over and give their opinions about a district's title I application.

Remember, the children come first. Try to find out if they are getting what they need. In a sense, parents should be looking for many of the same things Federal and State staff members examine when they monitor title I activities.

These are some of the ways individual parents and citizens become involved in school activities. Some of these same tasks must be assumed by members of the school district's parent advisory council.

THE ROLE OF THE PARENT ADVISORY COUNCIL

This section discusses the parent advisory council from the viewpoint of the parents—what their rights and responsibilities are, what help they can expect from the local education agency, and what role the council should have in the title I program. Parents might also want to look at *Parental Involvement in Title I ESEA*, a publication of the Office of Education (OE) specifically written to help local and State officials understand and implement the Federal requirements for parent councils.

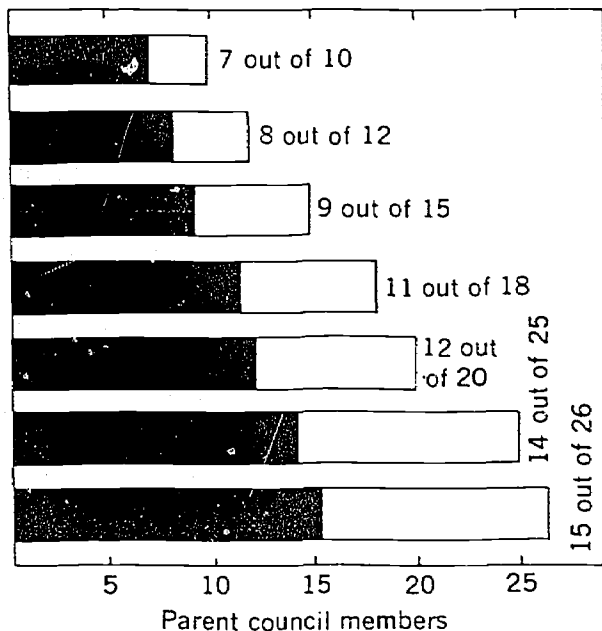
Federal Requirements

Public Law 91-230 gave the U.S. Commissioner of Education the power to require parental involvement for any federally financed education program which he felt might be helped by parental participation. In a sense, this decision had already been made for title I. Parental involvement was already required—but not to the extent ordered by the Commissioner. On October 14, 1971, the *Federal Register* printed new title I regulations requiring each local education agency with a title I program to establish a districtwide parent advisory council. Although the law uses the term "local education agency" (LEA), this book usually refers to LEA's as school districts. The regulations said parents had to be involved in

the planning, development, operation, and evaluation of title I projects.

Among the most important provisions is the one

FIGURE 2.—Parent Council Membership: More Than a Majority of Parents



requiring that the council be made up of "more than a simple majority of parents." Figure 2 illustrates the meaning of this phrase. For instance, if a council had 25 members, a simple majority would be 13. But since the regulation requires "more than a simple majority," a 25-member council must include at least 14 parents of children eligible for title I. The other provisions in the regulations will be discussed below as part of the duties of the council and duties of the local school district.

State education agencies may add more parental involvement requirements. For instance, Massachusetts requires that all parent council members be elected. Other States say *all* council members must be the parents of children eligible for title I. Parents should be sure they understand both the Federal and State requirements affecting parent advisory councils.

Establishing a Parent Advisory Council

School districts which have already established advisory councils indicate there are six important components to consider: preparation, membership, training, organization, support, and evaluation.

Preparation simply means laying the groundwork for parental involvement. Some parents and other

Use this space to list State requirements for parent advisory councils and/or parental involvement.

community members feel ill-at-ease in a school atmosphere; they are afraid to question the system or to make suggestions. A parent advisory council cannot be successful in this type of atmosphere. Parents and school officials must prepare for increased parental involvement by improving school-home relationships, by helping teachers and administrators understand the positive effects of parental involvement, and by making parents feel more at home in the schools. Each school district and its title I parent council will find its own way of doing this. Spokane, Wash., organized 3-week conferences, bringing teachers and parents together for an exchange of ideas and worries. Other districts sponsor a series of speeches and discussions on parental involvement. These are all ways of paving the way for an advisory council.

The basic rule of membership is that the parents of children eligible for title I must make up more than a simple majority of the council. This does not mean that their children must actually be receiving title I services, only that they are eligible. And while parents who work for the school district may serve on the council, they may not be counted in the "more than a simple majority." There are two other membership rules:

1. The parents on the council must be representative of the children and attendance areas served by title I. This means the parents of nonpublic school children eligible for title I services should be on the council. And if a district's title I program serves a large number of non-English-speaking children, the parents of these children should also be included on the council.

2. A group which already exists, such as a home and school association or an advisory group for a local project, may be the title I advisory council. However, such a group must meet all the above membership requirements.

Federal regulations do not say how council members should be selected. Some school districts hold elections at each target area school, with a representative from each school serving on the districtwide advisory council. Some districts appoint council members. The New Orleans school system asked which parents wanted to serve on the council. Parents already serving on an advisory council should be sure that council elections and/or appointments are well publicized so other interested parents have an opportunity to participate.

Training is an important ingredient in insuring the success of a parent advisory council. If parents are

to really be involved in the planning, development, operation, and evaluation of the title I program, they must know what they are doing. The title I council, working with school district officials, should organize a training program for parent council members. Basic training should include discussions of the basic requirements for title I (Federal, State, and local), an examination of how the school district plans its title I programs and who is responsible for what aspects, and visits to title I projects. Council members might also need advice on organizing committees, making reports, conducting evaluations, and holding elections. The training should be a continuous process. Council members should ask for help when they need it, and school officials should watch for areas where council members may need more information or an opportunity to question someone about information they don't understand.

The *organization* of a parent advisory council is entirely up to the council. *Roberts' Rules of Order* describes a number of organizational structures. At a minimum, council members will probably want to choose a chairman, assistant chairman, secretary, and parliamentarian. They may also want to appoint a committee chairman to deal with specific tasks or problem areas.

The best *support* the school district can give a parent council is information, both written and personal. The section on the duties of the school district lists the information which council members *must* be given, but it would be helpful for them to have other data. For instance, the school superintendent or a member of his staff should brief council members on the structure and organization of the school system (which offices does what) and the overall school budget. This is the only way the council will understand how the title I program fits in with the regular school program and what priority title I has in the district. Council members should know how title I participants are selected, how many children receive title I services, what needs of eligible children are considered most important in planning the title I program, how personnel are hired, and what types of facilities and supplies are needed. In the city of Baltimore, Md., a library of title I information in each title I school was set up.

There are other types of support the council may need from the school district. It will need a convenient meeting place and the availability of school officials for answering questions, et cetera. The council may need money to pay members' transportation costs, babysitting fees, or to buy supplies. School

officials should give the council as much support as possible.

The last step to consider in establishing a parent advisory council is *evaluation*. Because parent advisory councils are a new requirement in title I, it is very important that their success—or failure—be evaluated. Some of the questions parents and school officials will want to answer in evaluating the effectiveness of parent councils include:

1. How were council members selected? Are they representative of all title I parents in the district?
2. Did the council participate in the planning of the district's title I projects? Were council members' opinions and suggestions considered and acted upon?
3. What recommendations did the council make about the district's title I program? Were these recommendations included in the application sent to the State?
4. Does the council have regularly scheduled meetings? Are the meetings well publicized in advance and open to the public?
5. Are parents other than council members given a chance to voice their opinions?
6. Do school officials brief the council about future plans and changes in title I projects?
7. How are council members and other parents involved in the operations of the title I program?
8. Is there a training program for council members? What does it involve?
9. How effective is the council in getting other parents involved in school activities?
10. What is the community response to the council?

If the council has not been successful in meeting its goals, then evaluators should find out why. Did the council receive enough support from school officials? Did council members ask for help, when needed? Did school officials listen to the views of council members? Answering such questions will help educators and parents see the council's strengths and weaknesses.

Duties of a Parent Council

Although title I regulations say parents must be involved in the planning, development, operation, and evaluation of title I projects, they do not spell out how this involvement should take place. The few specific functions of the parent council mentioned in the regulations include:

1. To review applications and evaluations of past and present title I programs.
2. To make recommendations about the needs of eligible children and how these needs can be met.

3. To submit comments, if desired, to local school personnel and the State about the title I application

Beyond these duties, the functions of the council should be decided jointly by members of the council and the local school administrators. Figure 3 illustrates the types of functions a council should assume.

The council should be particularly concerned with community relationships. In addition to acting as a go-between for other parents and citizens and the school administration, council members should encourage better school-home relationships. They should invite other parents and community members to visit title I projects, to take part in council meetings, and to make suggestions about title I activities. The council should be sure title I activities, especially those which are successful, receive publicity.

If school officials and/or employees serve on the council, parents should be sure they do not dominate the council. If this should happen, the majority of the council—parents—should think about restricting school employees' council membership to nonvoting status. Even when a council is composed entirely of parents, it will want to invite school officials, representatives of business, civic, civil rights, religious, welfare, and social service organizations, and students, to attend council meetings as observers and resource persons.

Duties of the Local School District

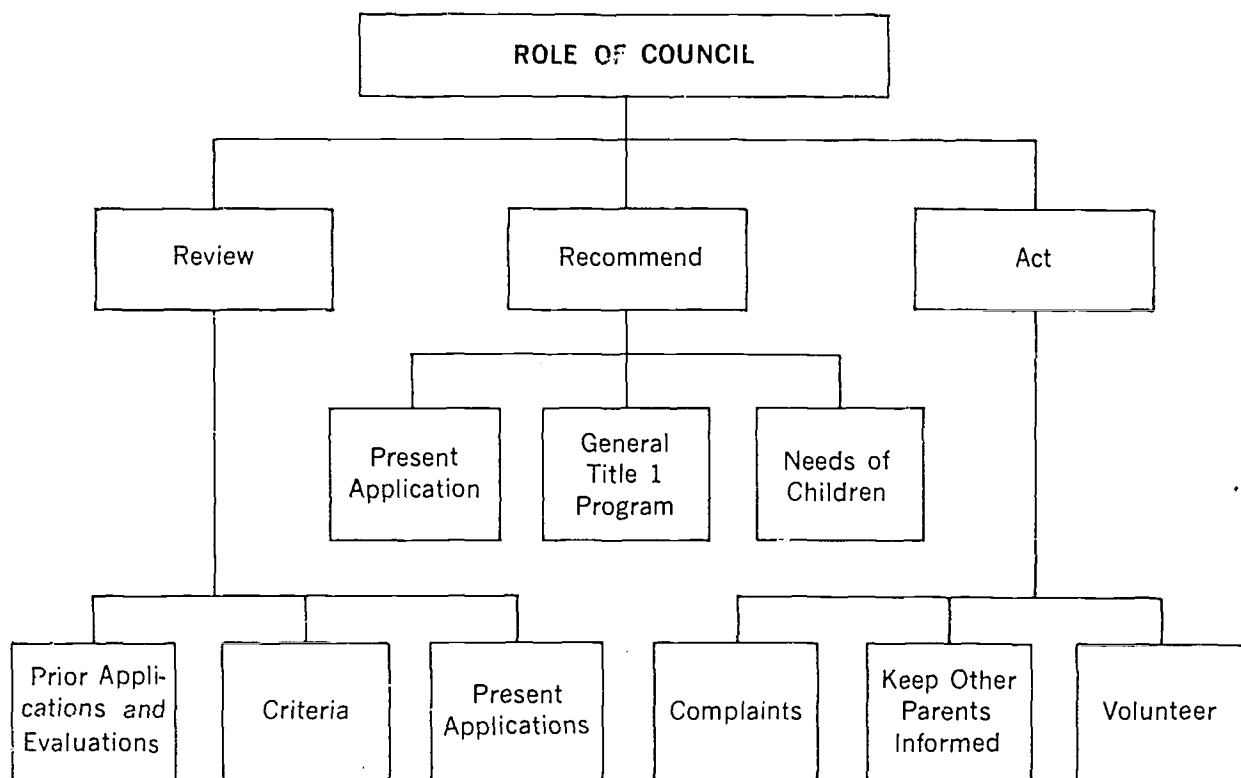
Local education agencies must support and cooperate with their title I parent advisory councils. In general, this means a school district must:

1. Provide any information *parents* may need to participate effectively in the planning, development, operation, and evaluation of the title I program.
2. Consider *parents'* views. Title I regulations specifically say that parents should have a chance to voice their opinions about the needs of educationally deprived children in title I target areas and about the title I application. Parents' viewpoints should be sent to the State along with the title I application.
3. Establish a procedure for handling complaints from *parents* and other community members.
4. Provide the parent council with plans for developing future title I projects.
5. Describe in the project application how parents were involved in the planning of the project and develop plans for continuing their involvement.

To fulfill this last duty, a school district must provide each member of a parent council, free of charge, with the following:

1. Title I laws

FIGURE 3.—Functions of a Parent Advisory Council



2. Federal regulations and guidelines about title I
3. State regulations and guidelines for title I
4. Current and past title I applications
5. Current and past title I evaluations

School officials should also provide parent council members with any other information they may need to perform their duties.

In addition to these duties to *parents* in the entire school district, school officials must keep all parents—not just council members—in *each* project area aware of the title I services available to their children.

There are a number of national organizations knowledgeable about the title I program. Some of these organizations have worked very closely with parents encouraging them to become more involved in the title I program in their school district. Some of the organizations that are willing to offer parents and community members additional suggestions about title I are:

1. The National Urban League
55 East 52d St.
New York, N.Y. 10022

2. The NAACP Legal Defense and Educational Fund
10 Columbus Circle
New York, N.Y. 10019
3. American Friends Service Committee
51 Fairlie St., NW.
Atlanta, Ga. 30303
4. Lawyers' Committee for Civil Rights
733 15th St., NW.
Suite 520
Washington, D.C. 20005
5. Harvard Center for Law and Education
38 Kirkland St.
Cambridge, Mass. 02138

How To File a Complaint

The first thing to remember about filing a complaint regarding title I is to try to avoid it. A complaint implies a lack of cooperation between parents and school officials. If parents are not satisfied with some aspect of the title I program, their first step should be to talk to school administrators and program directors. They should ask for a hearing with

the parent council and/or school board to point out the program areas parents feel are ineffective, suggest alternatives, and ask for changes. Only when this course of action fails should a formal complaint be filed.

This should not stop parents from filing complaints, because a complaint can be very helpful in insuring that title I funds are being used in the best interests of educationally deprived children. Just filing a complaint can help focus attention on problem areas and encourage change.

A *complaint* usually deals with some violation of Federal or State title I regulations—the misuse of funds, inadequate needs assessment, failure to involve children from nonpublic schools, and so forth. If talks with local school administrators fail to solve such problems, parents can—and should—file a complaint. They should clearly state all the details in the case, including the school district's failure to act. Since the State department of education has the legal responsibility for monitoring local title I operations, the

complaint should be sent to the State title I coordinator. Table 2 lists the addresses and phone numbers of State title I Coordinators.

There are several ways the State title I coordinator can handle the complaint. He may ask the local superintendent of schools to hold a public hearing and to answer the complaint in writing. He may send a team of State title I staff members to investigate the complaint and file a report.

Parents may file a complaint with the Division of Compensatory Education, Seventh & D Streets SW., Washington, D.C. 20202, specifically addressed to the branch chief responsible for overseeing title I operations in their State. Federal officials will then request the State to investigate and respond within 30 days. The Office of Education will not identify the complainant. It is the responsibility of State title I coordinators to resolve complaints. In some instances the Office of Education will visit the site, review situations, and report on complaints. A written report will be submitted to the complainant.

TABLE 2.—State ESEA Title I Coordinators

Alabama

Coordinator of Title I, ESEA
State Department of Education,
State Office Bldg., Rm. 460
Montgomery, Ala. 36104
Phone: 205-269-7357

Alaska

Coordinator of Federal Programs
State Department of Education
326 Alaska Office Bldg.
Juneau, Alas. 99801
Phone: 8-206-442-0150
ask for Juneau 586-5366

Arizona

ESEA Title I Director
State Department of Education
1688 West Adams St.
Phoenix, Ariz. 85007
Phone: 602-271-5235

Arkansas

Associate Director for Federal Programs
State Department of Education
Arch Ford Education Bldg.
Little Rock, Ark. 72207
Phone: 501-371-1287

Coordinator of Title I, ESEA
State Department of Education
Arch Ford Education Bldg.
Little Rock, Ark. 72201
Phone: 501-371-1803

California

Director, Division of Compensatory Education
State Department of Education
721 Capitol Mall
Sacramento, Calif. 95814
Phone: 916-445-2590

Colorado

Federal Programs Coordinator
State Department of Education
State Office Bldg.
Denver, Colo. 80203
Phone: 303-892-2266

Director, Title I, ESEA
State Department of Education
State Office Bldg.
Denver, Colo. 80203
Phone: 303-892-2266

TABLE 2.—State ESEA Title I Coordinators—Continued

Connecticut

Coordinator of Title I, ESEA
State Department of Education
165 Capitol Ave., Rm. 360
Hartford, Conn. 06115
Phone: 203-556-4382

Delaware

Coordinator of Title I, ESEA
State Department of Public Instruction
P.O. Box 697
Dover, Del. 19901
Phone: 302-678-4643

District of Columbia

Coordinator of Title I, ESEA
1411 K St., NW., Rm. 1400
Washington, D.C. 20004
Phone: 202-737-2557

Florida

Coordinator of Title I, ESEA
Department of Education
219 West Jefferson St.
Tallahassee, Fla. 32304
Phone: 904-599-5151

Georgia

Coordinator of Title I, ESEA
State Department of Education
State Office Bldg., Rm. 316
Atlanta, Ga. 30334
Phone: 404-656-2436

Hawaii

Administrator, Compensatory Education
State Department of Education
P.O. Box 2360
Honolulu, Hawaii 96804
Phone: 8-415-556-0220
ask for Honolulu telephone
number: 415-548-2211

Idaho

Program Administrator
Title I, ESEA
State Department of Education
Idaho State Office Bldg.
Boise, Idaho 83707
Phone: 208-384-2195

Illinois

Director, Title I, ESEA
Office of Superintendent of Public Instruction
1020 South Spring
Springfield, Ill. 62706
Phone: 217-525-6036

INDIANA

Director
Federal Projects Division
State Department of Public Instruction
803 State Office Bldg.
100 Senate Ave.
Indianapolis, Ind. 46204
Phone: 317-633-4436

IOWA

Chief of Title I, ESEA
Department of Public Instruction
Grimes State Office Bldg.
Des Moines, Iowa 50319
Phone: 515-281-5313

KANSAS

Director of Title I, ESEA
State Department of Education
Kansas State Education Bldg.
120 East 10th St.
Topeka, Kans. 66612
Phone: 913-296-3161

KENTUCKY

Coordinator of Title I, ESEA
State Department of Education
Frankfort, Ky., 40601
Phone: 502-564-3301

LOUISIANA

Acting Director of Federally Assisted Programs
State Department of Education
Baton Rouge, La. 70804
Phone: 504-389-5291

MAINE

Coordinator of Title I, ESEA
State Department of Education
Education Bldg.
Augusta, Maine 04330
Phone: 207-289-3541

TABLE 2.—State ESEA Title I Coordinators—Continued

MARYLAND

Coordinator of Title I, ESEA
P.O. Box 8717
Friendship International Airport
Baltimore, Md. 21240
Phone: 301-796-8300, ext. 230

MASSACHUSETTS

Director of Title I, ESEA
State Department of Education
182 Tremont St.
Boston, Mass. 02111
Phone: 617-727-5752

MICHIGAN

Chief Administrator
Compensatory Education
State Department of Education
Box 420
Lansing, Mich. 48902
Phone: 517-373-3666

Coordinator of Title I, ESEA
State Department of Education
Box 420
Lansing, Mich. 48902
Phone: 517-373-3666

MINNESOTA

Coordinator of Title I, ESEA
State of Minnesota Department of Education
Capitol Sq., 550 Cedar St.
St. Paul, Minn. 55101
Phone: 612-296-2181

MISSISSIPPI

Coordinator of Title I, ESEA
State Department of Education
P.O. Box 771
Jackson, Miss. 39205
Phone: 601-354-6944

MISSOURI

Coordinator of Title I, ESEA
State Department of Education
P.O. Box 480
Jefferson City, Mo. 65101
Phone: 314-635-8125

Assistant Commissioner
Division of Instruction
Coordinator of Public Law 89-10

MONTANA

Director of Basic Skills
Office of State Superintendent of Public
Instruction
Helena, Mont. 59301
Phone: 406-449-2410

Supervisor, ESEA, Title I
Office of State Superintendent of Public
Instruction
Helena, Mont. 59301
Phone: 406-449-2410

NEBRASKA

Federal Projects Director
State Department of Education
233 S. 10th
Lincoln, Nebr. 68509
Phone: 402-471-2481
Coordinator, Title I, ESEA

NEVADA

Director, Federal Relations
State Department of Education
Carson City, Nev. 89701
Phone: 702-882-7161

NEW HAMPSHIRE

Coordinator, Title I, ESEA
Division of Instruction
State Department of Education
64 North Main Street
Concord, N.H. 03301
Phone: 603-271-2717

NEW JERSEY

Coordinator of Title I, ESEA
State Department of Education
225 West State St.
Trenton, N.J. 08625
Phone: 609-292-4090

NEW MEXICO

Director of Title I, ESEA Programs
State Department of Education Bldg.
Santa Fe, N. Mex. 87501
Phone: 505-827-5267

TABLE 2.—State ESEA Title I Coordinators—Continued

NEW YORK

Coordinator of Title I, ESEA
State Education Department
Room 367
Albany, N.Y. 12224
Phone: 518-474-1231 or 5623

NORTH CAROLINA

Special Assistant for Compensatory Education
State Department of Public Instruction
Raleigh, N.C. 27602
Phone: 919-829-7665

NORTH DAKOTA

Coordinator of Title I, ESEA
State Department of Public Instruction
State Capitol Bldg.
Bismarck, N. Dak. 58501
Phone: 701-224-2282

OHIO

Coordinator of Title I, ESEA
State Department of Education
3201 Alberta St.
Columbus, Ohio 43204
Phone: 614-469-4161

Chief, Special Programs Section
Director
Division of Federal Assistance
State Department of Education
State Office Bldg., Rm. 603
65 South Front St.
Columbus, Ohio 43215
Phone: 614-469-2223

OKLAHOMA

Director of Title I, ESEA
State Department of Education
Oklahoma City, Okla. 73105
Phone: 405-478-1374

OREGON

Director, Compensatory Education
State Board of Education
Salem, Oreg. 97310
Phone: 503-378-3606
Coordinator, Title I, ESEA

PENNSYLVANIA

Assistant Director
Division of Development
Bureau of Curriculum
Development and Evaluation
State Department of Education
Box 911
Harrisburg, Pa. 17126
Phone: 717-787-7135
Coordinator, Title I, ESEA
Phone: 717-787-7136 or 37

RHODE ISLAND

Coordinator for Compensatory Education
State Department of Education
Roger Williams Bldg.
Hayes St.
Providence, R.I. 02908
Phone: 401-277-2841,
2842, or 2843

SOUTH CAROLINA

Coordinator of Title I, ESEA
State Department of Education
Rutledge Bldg., Rm. 201
Columbia, S.C. 29201
Phone: 803-758-3471

SOUTH DAKOTA

Coordinator of Title I, ESEA
State Department of Public Instruction
Pierre, S. Dak. 57501
Phone: 605-224-3218, or 3219

TENNESSEE

Coordinator of Title I, ESEA
State Department of Education
221 Cordell Hull Bldg.
Nashville, Tenn. 37219
Phone: 615-741-3433, 3434, 3889

TEXAS

Director
Division of Compensatory Education
Texas Education Agency
201 East 11th St.
Austin, Tex. 78701
Phone: 512-475-4126
Director, Program Approval of Funds
Phone: 512-475-3327

TABLE 2.—State ESEA Title I Coordinators—Continued

UTAH

Coordinator of Title I, ESEA
Office of the Superintendent
of Public Instruction
136 East South Temple
Salt Lake City, Utah 84114
Phone: 801-328-5061

VERMONT

Chief, Special Projects
Title I, ESEA
State Department of Education
State Office Bldg.
Montpelier, Vt. 05602
Phone: 802-223-2311, ext. 515

VIRGINIA

Coordinator of Title I, ESEA
State Board of Education
Richmond, Va. 23216
Phone: 703-770-3179

WASHINGTON

Director, Grants Management
Superintendent of Public Instruction
Olympia, Wash. 98501
Phone: 206-753-3220

Supervisor, Grants Management
Title I Contact, Superintendent
of Public Instruction
Olympia, Wash. 98501
Phone: 206-753-2562

WEST VIRGINIA

Assistant Director of Federal Programs
Title I, ESEA
State Department of Education
State Capitol Bldg., Rm. W-217
Charleston, W. Va. 25305
Phone: 304-348-2701

WISCONSIN

Coordinator of Title I, ESEA
State Department of Public Instruction
126 Langdon St.
Madison, Wis. 53703
Phone: 608-266-2699

WYOMING

Director, Title I
State Department of Education
Cheyenne, Wyo. 82001
Phone: 307-777-7343
Coordinator of Federal Programs
Phone: 307-777-7751

AMERICAN SAMOA

State Coordinator of Federal Programs
Department of Education
Pago Pago, American Samoa 96920
Coordinator of Title I, ESEA

GUAM

Acting Administrator Federal Programs
Department of Education
P.O. Box DE
Agana, Guam 96910

PUERTO RICO

Coordinator of External Resources
Department of Education
Hato Rey, P.R. 00900
Phone: 106-809-766-1096

TRUST TERRITORIES

Director of Education
Office of the High Commissioner
Trust Territory of the Pacific Islands
Saipan, Mariana Islands 96950

VIRGIN ISLANDS

Coordinator, Federal Programs
Department of Education
St. Thomas, V.I. 00801
Phone: 809-774-0100, Ext. 251

BUREAU OF INDIAN AFFAIRS

Title I Chief
Bureau of Indian Affairs
P.O. Box 1788
Albuquerque, N. Mex. 87103
Phone: 505-843-2652, 53, 54

UNITED STATES CATHOLIC CONFERENCE

Assistant Director for Governmental Programs
Division of Elementary and Secondary Education
United States Catholic Conference
1312 Massachusetts Ave., NW.
Washington, D.C. 20005
Phone: 202-659-6652

What Are the Local School District's Responsibilities Under Title I ESEA?

Title I is often described as a federally financed, State-administered, and locally operated program. The next three chapters discuss this division of authority. The Federal Government pays the bills for title I and, thus, to protect its money makes sure its rules are followed. The State education agency oversees all title I operations in the State, making sure that participating local school districts follow all title I rules. But it is the local school district which is primarily responsible for the actual planning, operation, and evaluation of its own title I program. And, since parents are closer to the local school district than to the State or Federal Government, it is at this level that it will be easiest for them to see if title I is working as it should.

As part of its responsibilities under title I, the local education agency must:

1. Identify the educationally deprived children in low-income areas of the school district and determine their special needs. (See pages 13-18.)
2. Select eligible attendance areas and from these project areas. (See pages 62-63.)
3. Design and implement projects, in accordance with title I regulations and program guides, to meet the educational needs of children. (See pages 3-10.)
4. Coordinate title I with other compensatory education projects in the school district.
5. Submit an application to the State education agency. (See page 11.)
6. Maintain fiscal effort with respect to total current expenditures in project areas, being sure they are comparable to nonproject areas. (See the comparability section on pages 8-10.)
7. Involve parents in the planning, operation, and evaluation of the title I program. (See pages 21-27.)
8. Maintain fiscal records of all title I money spent and report to the State on the use of these funds.
9. Make information on title I projects available to parents and the public.

10. Evaluate the local title I program.

Many of these responsibilities were discussed in earlier chapters. Therefore, this chapter will concentrate on the local school district's tasks in relation to informing the public about the title I program and evaluating the program.

KEEPING EVERYONE INFORMED ABOUT TITLE I

Title I uses the phrase "disseminating information" when it talks about letting people know about title I. Disseminating means spreading, so *disseminating information* really just means getting the word out about title I.

There are several groups who need to know about title I, and the law includes separate provisions for each of these groups:

1. *The State education agency (SEA).*—The law says the local school district must submit an annual report and any other reports the SEA may require on the district's title I activities. This information may include achievement levels of students participating in the title I program. The State needs these reports to fulfill its own reporting requirements for the Office of Education (see pages 41-44).

2. *Parents and the general public.*—The law requires that the local school district make title I applications and "all pertinent documents related thereto" available to parents and the general public. It also specifies that all evaluation reports are public information; that is, any interested citizen has a right to see these reports.

3. *Teachers and other educators.*—The school district must see that teachers and administrators are kept informed of new and/or successful educational research, demonstration, and other projects. The results of these projects should be used in planning or revising title I activities within the district.

Use this space to describe the organizational structure of your local school district and where title I fits in. List the name, address, and phone number for each person having authority over title I activities.

Usually most school districts see to it that the State education agency and their own employees get all the information they need to function effectively. But a problem sometimes arises in keeping parents and the general public informed about title I activities. The general public means anyone or everyone who wants information; it may include parents or may be a citizen with no children in school; it may be a news reporter or a student studying school district policies in relation to title I. Any of these people has a right to know about title I.

In general there are four kinds of information available about title I:

1. The basic requirements of title I and how the program works. This would include information on title I laws, Federal and State requirements for title I, and examples of successful title I programs.

2. The school district's own title I program. This would include the needs assessment done to determine the priority needs of eligible children, the district's title I application, its hiring and training policies for staff members, and plans for how the title I program will actually operate.

3. The district's old title I programs. This information will give the public a comparison for determining how effective the present title I program may be. Information about old programs should include explanations of successes or failures.

4. Evaluations of past and present title I activities.

The only records with information from these four categories which school district officials may refuse to let outsiders see are achievement records which include student and/or teacher names. A parent may see his own child's test scores, but no one else has a right to this information. The school district must provide anyone who asks with a general indication of how well children did on tests, et cetera, but it may not release test scores which correspond to student or teacher names. School officials may also choose to keep incomplete reports private. This is a legitimate delay if figures are being verified or a posttesting done for comparison purposes. Members of the general public should ask when the information will be available and request it again. Any information submitted to the State as part of a title I report should automatically become available to the public.

The law simply says that the general public must have access to the information. This means the school district must let any interested person read the information. If the person wants a copy of any particu-

lar report or document, the school district may charge him for the cost of reproduction.

Members of a district's parent advisory council must be given copies of title I reports free of charge.

A school district committed to making sure that both parents and the general public know about its title I program will start its own dissemination activities, rather than waiting for parents or others to request information. The school district may issue press releases, send flyers explaining title I services and activities to homes in eligible attendance areas, arrange for speakers at parents' and community meetings, and publish information especially designed to help the general public understand title I. Parents should encourage officials in their school district to start a positive public information program which will keep the community informed about title I and other school activities. Such a program helps prevent misunderstandings and encourages greater community participation in the title I program.

EVALUATING TITLE I PROJECTS

An *evaluation* is simply determining the success or failure of a project. Many people feel an evaluation is something educators are concerned with only *after* a project is completed. Actually, the evaluation is part of the initial planning process for a project and continues throughout the project's operation.

There are two types of evaluations—process evaluation and product evaluation. Process evaluation is the type of evaluation conducted the entire time the project is in operation: it determines if the project is operating as it should; that is, is it following title I rules, is it serving the limited number of children chosen to participate in the project, are all the children getting the services they should, and so forth. Product evaluation, on the other hand, takes place at the end of a project; it determines how successfully the project has met predetermined objectives; that is, whether the project did what it was supposed to.

The first step in the evaluation process—setting objectives—is also one of the primary steps in planning a title I program. Once a school district has chosen target areas and conducted a needs assessment of educationally deprived children in those areas, then it is ready to say what it wants to accomplish in its title I program. This is called setting objectives, and it must be done before the actual activities which will make up a title I program can be planned. For instance, it would be silly to plan a title I program based on a reading lab where children can improve

their reading skills if you later decide the objective for the title I program, according to the children's needs, should be to improve their math skills.

The original legislation for title I required that "effective procedures, including provision for appropriate objective measurements of educational achievement, will be adopted for evaluating at least annually the effectiveness of the programs in meeting the special educational needs of educationally deprived children." Because title I evaluation reports were too often not specific enough to give any indication of whether any academic progress occurred, the Congress passed an amendment to title I in 1970 which required the inclusion of performance objectives in title I applications. A *performance objective* is a statement of what the title I program is intended to accomplish in specific, measurable terms. The law now says: "the LEA will make an annual report relating to performance in accordance with specific performance criteria related to program objectives to enable the SEA to perform its duties, including information relating to the educational achievement of students participating in title I . . ."

A performance objective should answer the questions, who, what, how much, and when—who should accomplish something, what should be accomplished, how much should be accomplished, and when will the accomplishment be measured. As an example, take the following performance objective:

75 percent of fifth-grade, title I students testing 2 or more years below grade level will increase in reading achievement by 1.5 years as measured by "X" test by May 30.

The objective answers all four questions: who—75 percent of fifth-grade title I students testing 2 or more years below grade level; what—increase reading achievement; how much—1.5 years on "X" test; and when—by May 30.

Separate objectives must be written for each project and for each behavioral outcome anticipated as part of a district's title I program. For instance, if a district's title I program includes a remedial reading project, a teacher-training program, field trips to improve students' self-image, and an English-as-a-Second-Language project for Spanish-speaking children, separate objectives must be written for each project. The objectives for the reading project will probably be expressed in terms of growth rates on pretests and posttests. The objectives for the teacher training and field trips will be more difficult to set because there are no standardized tests to judge the

effectiveness of such activities. For teacher training, depending on the type of training offered, the objective may be to increase the number of times a teacher uses the classroom aide for instructional assistance to students. The objective for the field trips, with the intended behavioral outcome of improving students' self-image, may be to expose students to five different job categories.

The performance objectives are the basis for the evaluation design. The evaluation is the measurement of how well these objectives have been reached. It helps determine a program's effectiveness in improving student achievement and provides data to identify successful activities and reject ineffective ones.

There are six essential elements in an evaluation design.

1. *Participants*.—An evaluation should consider the effect of a project on all participating students, but in a school district where thousands of children are involved in a single project, it may be impossible to gather data on all these children. In such cases, the evaluation will be based on a sampling that is, a small portion, of the participants. Parents should be sure the sampling is representative of the total number of children: in other words, if nonpublic school children participated in the project, the evaluation sampling should include some nonpublic school children. If the project involved first, second, and third graders, the sampling should include some children from each grade level. Some evaluation designs will require the use of a control group. A control group is a group of children with similar characteristics to the children in the project but who are not receiving the extra help the project offers.

2. *Objectives*.—See the preceding explanation.

3. *Measuring devices*.—The evaluation design should explain how success or failure in meeting the objectives will be measured. In measuring academic progress, the most common procedures used are pretests and posttests. These are tests given to children at the beginning (pre) and end (post) of a program. Parents should be sure that the pretests and posttests are from the same source so results are truly comparable. It is also important to see that measuring devices do not discriminate against any children. For instance, if a school district has a large Spanish-speaking student population, perhaps tests should be administered in Spanish. Parents should question school officials about how measuring devices were chosen to be sure the devices are fair.

4. *Data analysis*.—Most evaluations produce sta-

tistical information which must be interpreted by experts before parents and the general public can understand its meaning. Parents should be sure evaluation results are presented in understandable terms so they can judge the success or failure of the program for themselves.

5. *Conclusions.*—An analysis of the data will lead to certain conclusions about how well the project met its objectives. These conclusions usually form the basis for the evaluation report.

6. *Recommendations.*—An evaluation should not end with the submission of a report on the conclusions based on an analysis of test data. The conclusions and the data upon which they are based should be used to make recommendations for program improvements, expansion, or revision. For instance, if data indicates that a remedial reading program improved the reading achievement of second and third graders but had no real impact on the progress of first graders, evaluators might recommend that supplementary reading

instruction at the first-grade level concentrate on reading readiness rather than remedial reading.

Title I requires that parents be involved in the evaluation, as well as in the planning and operation, of title I projects. This is why parents should be sure they understand their district's evaluation procedures and, if they don't, ask questions about them.

An evaluation is like a report card on the title I program. If the evaluation shows that the program did not fulfill the objectives set, then the program needs to be revised. Perhaps standards were set too high. Perhaps too many children were involved. Whatever the reason, a negative evaluation report demands some changes before a similar project should be funded. On the other hand, a favorable evaluation report can mean one of two things: the project was so successful that help in this area is no longer needed; or the project successfully met the needs of a small group of children and, based on this success, should be expanded to include more children the next year.

What Are the State's Responsibilities Under Title I ESEA?

The State has two distinct types of responsibilities in relation to the title I program. The first is very much like the duties of the local school district discussed in the previous chapter. For statewide title I programs—like those planned for migrant children—the State acts as a local education agency, planning, operating, and evaluating the program.

The State education agency has different obligations toward the local title I programs. The State is the liaison or go-between for the Office of Education and local school districts with title I programs. The State receives all title I funds and then divides them among eligible districts; it approves, improves, or rejects local title I applications; it oversees all title I operations within the State.

Among the specific duties of the State education agency according to title I law and regulations are:

1. Administer the statewide title I program.
2. Apply for funds, plan, operate, and evaluate statewide title I programs for migrant children, children in State institutions for the neglected or delinquent, and handicapped children. (See pages 55-56 and 15.)
3. Apply for incentive grants if eligible. (See page 55.)
4. Approve or reject local title I applications on the basis of their following title I regulations.
5. Divide basic title I grant money among local school districts. (See pages 52-53.)
6. Assist local school officials in the development of title I projects.
7. Monitor local title I projects.
8. Submit assurances to the Office of Education that title I regulations are being followed in the State.
9. Maintain fiscal records of all grant funds.
10. Compile reports as needed, based on information gathered from local school districts, to submit to the Office of Education.

11. Investigate complaints about local title I activities and report back to the complainant.

The State education agency's duties in regard to statewide title I programs have been discussed rather completely already. It is important to remember that for these programs, the State has the same evaluation and dissemination responsibilities as the local school district has toward its title I program.

This chapter concentrates on the State's responsibilities for overseeing local title I operations.

APPROVING TITLE I APPLICATIONS

The section on page 11 discussed title I applications—what they must contain and what information parents should be able to find out by reading an application. The State education agency receives an application from each local school district planning a title I program. It must decide whether or not to approve the application.

The law includes specific points that the State must look for in determining whether a school district's application may be approved. These are:

1. The project must be designed to meet the special educational needs of educationally deprived children in school attendance areas with high concentrations of children from low-income families, and the project must be of sufficient size, scope, and quality to show some promise of success.
2. Educationally deprived children from nonpublic schools who live in eligible attendance areas must have a chance to participate in the project.
3. The school district must control all funds and own all property purchased with title I money. Title I moneys will be used to supplement and not supplant State and local funds.
4. Any project involving construction must fit in with the overall State plans for the construction of

school facilities. All facilities must be designed so they can be used by handicapped persons.

5. Applications which include funds for planning purposes must prove that the money is necessary because of the unusual nature of the project or because the school district does not have the resources necessary for proper planning. The planning must be directly related to the title I program.

6. The school district must have an effective evaluation plan, including the use of objective measurements of academic achievement.

7. The school district must submit at least an annual report and any other reports that may be required to the State to enable the State to evaluate the statewide title I effort.

8. The application and other title I documents, including evaluations, must be available to parents and the general public.

9. Teachers and administrators should receive information about educational research and projects that will help them plan and/or operate a better title I program.

10. Projects involving construction must consider the excellence of building design and the inclusion of works of arts in the building.

11. Professional staff members and aides should be trained together.

12. Parents were involved in designing the title I program.

13. School districts must show that services provided with State and local money are comparable in title I and nontitle I schools.

Most of these points were discussed in some detail earlier in the text. They are repeated here as an indication of their importance in judging the legality of a title I project. If the State does not find evidence in the application that these points have been followed, then it cannot approve the district's title I application. This does not necessarily mean that the application is rejected. The State education agency will always try to work with local school officials to help them revise their application and conform to title I law and regulations. Even if an application is not approved, the school district has a right to request a hearing on the rejection.

The points listed above are not the only things the State looks for in a title I application. The State may also question how a school district planned its project—was the needs assessment adequate, were parents consulted, was the project limited to those children most in need of help. These are all important considerations in reviewing a title I application.

Parents should remember that they can have a great impact on the State's action in regard to a school district's title I application. The local school district must attach the comments of the advisory council and other parents in submitting the application to the State. State officials will examine these comments carefully, not only as a means of seeing how successfully the school district involved parents in its planning of the title I program but also as a means of assessing the extent to which title I guidelines have been followed.

MONITORING AND ASSISTING LOCAL SCHOOL DISTRICTS

The use of Federal funds—or any public moneys for that matter—demands some sort of monitoring so taxpayers can be sure their taxes are being properly spent.

In the case of title I, monitoring occurs at two levels; the U.S. Office of Education monitors statewide title I programs and, in a few instances, also examines local projects; the State education agency is responsible for monitoring local title I operations. Monitoring can include any number of activities. In a sense the examination of an application is monitoring, that is, checking to see that everything is in line with predetermined criteria. Studying reports submitted by another agency is another form of monitoring. However, the most effective way of monitoring is through onsite visits.

The U.S. Office of Education has published a booklet for State staff members entitled "Conducting Onsite Visits," which explains the importance of and the techniques to be used in an onsite visit. Parents, especially members of district advisory councils, will want to get a copy of this booklet to better understand the monitoring function. The booklet will also help parents realize things they should be looking for in observing title I activities within their own school districts.

An *onsite visit* is simply a trip to the place where a project is actually operating. Such a visit can have several purposes: to monitor, to offer assistance, or to identify good program practices. When the purpose of a visit is to monitor local title I activities, State staff members will be looking for three things:

1. If the local school district has followed all Federal and State guidelines in regard to title I. This is sometimes called *compliance*.

2. If title I activities in the district are the same as those described in the application.

3. How good the title I program is.

If the onsite visit is general, that is if it was not arranged to deal with a specific problem area, then the monitors will consider at least the following items: target area selection, comparability, parental involvement, private school involvement, needs assessment, project objectives, instructional program development, project implementation, evaluation, financial management, dissemination activities, and handling of complaints. Some onsite visits will concentrate on only one or several of these items, perhaps in answer to a complaint or to clarify the district's application or evaluation.

To be successful, an onsite visit must be well planned. The State education agency should arrange the visit at a time convenient for the school district superintendent and his staff. The local staff should be told the purpose(s) of the visit, how it will be conducted, and the names of State personnel who will visit. Local and State staff members should arrange an agenda well in advance of the scheduled visit; this insures that knowledgeable personnel are available when monitors need questions answered.

The school district should make sure that not only administrators but also teachers, aides, parents (especially members of the advisory council), and even children are free to talk with the visiting State employees. The school district should also analyze its own title I activities prior to the visit. This will remind all staff members of the details of the project and where there are problem areas, if any, making them more able to answer questions effectively.

The visit itself should begin with a meeting between the State monitoring team and the administrative local staff, including the superintendent. This meeting is sometimes called an *entrance conference*. The purposes of the visit should be discussed at the meeting and any changes in the agenda should be made so all participants know exactly what the agenda is. Ordinarily the State team will begin its actual monitoring by reviewing administrative procedures for title I with project personnel. This may involve an examination of some records and conversations with district administrators; the school district should be prepared to supply State staff members with any information they may request. Then the monitoring team will visit actual project sites, seeing the project in action and talking with teachers, aides, and parents about the project. The onsite visit should end with another joint meeting of State and local staff members at which time the State personnel should present their preliminary findings and recommendations.

The actual onsite visit should be followed by a formal report, sent to the district superintendent, that lists the findings and recommendations of the State team. The State should offer the local school district help in solving any problems and should be sure that the recommendations of the monitoring team are put into effect. The superintendent should see that title I staff members, the parent advisory council, and any other persons who participated in the onsite visit receive copies of the State team's report.

The second and third types of onsite visits—those designed to offer technical assistance to a school district or to identify good projects—are often the direct result of a monitoring visit. If the monitoring team found few problem areas and discovered that the project was improving student achievement, it may recommend that the project be publicized throughout the State as a good example of a successful title I project. This would mean that writers from the State education agency would return to the school district to gather more information for publication—how the project was planned, how it was implemented, what the evaluation results are. On the other hand, if the monitoring team found many problems in the local title I program, it can suggest as part of its final report, that various specialists on the State staff visit the school district to help solve the problems. For instance, a State auditor might be able to help local staff members set up an accounting system to keep better track of title I funds. A bilingual education specialist could help local planners design a program for Spanish-speaking children. An evaluation expert might help local staff members design special tests directly related to the title I program. All these are forms of *technical assistance*: that is, help provided by experts for a specific purpose. States, with their larger staffs, must provide as much technical assistance as possible to local school districts, just as the Office of Education has an obligation to provide technical assistance to States when needed.

PROVIDING ASSURANCES TO OE

Because the State education agency has the responsibility of seeing that local school districts follow title I rules, it must promise the Office of Education certain conditions are being met throughout the State. The law says each State must provide three assurances:

1. Title I funds will be used only for projects ap-

proved by the State, which comply with all Federal rules, especially those listed on pages 3 and 11.

2. The State will have an accounting system to see that title I funds are properly distributed and ac-

counted for.

3. The State will submit periodic evaluation reports and any other reports that may be required to the Office of Education.

What Are the Federal Government's Responsibilities Under Title I ESEA?

The General Education Provisions Act of 1970, which amended parts of the Elementary and Secondary Education Act, includes a provision forbidding the Federal Government to interfere in the operations of local schools. The law says: "No provisions . . . shall be construed to authorize any department, agency, officer, or employee of the United States to exercise any direction, supervision, or control over the curriculum, program of instruction, administration, or personnel of any educational institution, school, or school system, or over the selection of library resources, textbooks, or other printed or published instructional materials by any educational institution or school system, or to require the assignment or transportation of students or teachers in order to overcome racial imbalance." This clause does not prohibit the Federal Government from enforcing criteria which the law authorizes the U.S. Commissioner of Education to establish.

Congress required the Office of Education, through the Commissioner, to see that title I funds were properly spent.

This chapter outlines some of the specific duties of the Federal Government in regard to title I. Although many of these tasks are the responsibility of the Office of Education, other Federal agencies are also involved in title I. The Bureau of the Census, part of the U.S. Department of Commerce, must provide the Commissioner with data needed to determine the number of children eligible for title I. The Bureau of Indian Affairs in the U.S. Department of the Interior acts as a State education agency in administering the title I program for Indian students in schools under the Bureau's jurisdiction.

All Federal agencies serving deprived children in low-income areas must provide the Commissioner with information he may need to make title I more effective. However, this chapter deals primarily with the functions of the Commissioner himself and the

Office of Education.

ORGANIZATION OF THE OFFICE OF EDUCATION

Like most Federal agencies, the organizational structure of the Office of Education changes frequently. The Office includes special units for Teacher Corps, the Right-To-Read program, the Indian Education program, program planning and evaluation, and education, and educational statistics. It also has bureaus responsible for occupational and adult education, postsecondary education, and programs for the handicapped. For the parents of title I children, the Office's most important unit is its Bureau of School Systems.

This Bureau includes the Division of Compensatory Education, which is directly responsible for title I at the Federal level. It also oversees the Office's bilingual education program, Follow Through, and many other elementary and secondary school programs that receive Federal assistance.

The Division of Compensatory Education (DCE) has several branches. The Migrant Education Branch oversees all migrant education projects financed under title I. The Program Support Branch provides help to State and local education agencies and parents in planning and operating better title I programs. Its staff includes specialists in parental involvement, dissemination, evaluation, nonpublic schools, and in several other important areas.

The other branches in the Division of Compensatory Education are operations' branches. Each branch—northeastern, southeastern, midwestern, far western, and southwestern—covers a geographic area consisting of about 10 States. Each has a small staff to monitor State and local title I programs in the respective regions, respond to parents' and citizens' complaints about title I, and assist school officials in meeting title I requirements. Parents should know the name, address, and telephone number for the branch covering their State. If the

local title I office cannot provide parents with this information, they should write to their State title I office or to the Division of Compensatory Education, U.S. Office of Education, Washington, D.C. 20202.

FEDERAL RESPONSIBILITIES FOR TITLE I

The Elementary and Secondary Education Act and its amendments include the following tasks as the responsibilities of the Commissioner of Education and/or the Office of Education:

1. Determine the funding allocation for eligible counties, State education agencies, outlying territories, and the Bureau of Indian Affairs in the U.S. Department of the Interior. This responsibility was discussed in part II.
2. Approve applications from State education agencies for statewide title I programs.
3. Withhold funds from any State education agency which fails to fulfill its obligations under title I.
4. Develop and disseminate regulations, program guides, and other materials affecting the administration of title I.
5. Monitor State and local title I programs.
6. Provide technical assistance to State education agencies and, with State approval, to local school districts.
7. Require parental involvement in programs which would benefit from it. This was discussed more fully in part II.
8. Inform the public about federally supported education programs.
9. Compile fiscal, statistical, and program reports evaluating the effectiveness of title I for submission to Congress and use by the general public.

Approving or Not Accepting Title I Applications

Local school districts submit their title I applications to the State education agency, not the Office of Education. Federal title I staff members may ask to see a local application during an onsite visit or to clarify any questions about the title I program in any school district. Parents also have a right to see these applications.

But the Office of Education *must* receive an application for any statewide title I program. This is particularly important for migrant education programs. To approve a title I application for migrant education the Commissioner must be satisfied that the State education agency:

1. Will use all title I money for programs and projects designed to meet the special educational needs of migrant children.
2. Coordinated its program with similar programs in other States, including the exchange of school and health records for migrant students.
3. Planned the program in cooperation with programs funded under title III of the Economic Opportunity Act.

For the general title I program the State must assure the Commissioner that:

1. Title I money will be used only for projects specifically approved by the State education agency which meet all Federal requirements.
2. It will maintain adequate financial records to account for the expenditure of Federal funds.
3. It will submit periodic (usually annual) reports evaluating the effectiveness of the State title I program and any other reports the Office of Education may require.

The Commissioner may withhold title I funds from any State which does not meet these requirements. Before an application can be rejected, however, the State education agency must have adequate notice and be given the opportunity for a hearing.

Federal Rules Governing Title I

The Elementary and Secondary Education Act and its amendments include the legal requirements for title I. However, some of these legal requirements need to be further explained to be practical. And the law also includes a number of references to additional requirements which the Commissioner may set.

The Office of Education uses two means of informing State and local school officials of Federal requirements for title I—regulations and program directives. Parents will want to be familiar with all these to fully understand the title I program.

New *regulations* are usually published for title I soon after any amendments to the law are passed; the regulations explain the amendments, putting them into practical terms. All regulations must be published in the *Federal Register*. They become effective 30 days after publication. Five sets of regulations have been published for title I. The LEA must provide the parent advisory council with copies of these regulations.

The Office of Education issued two sets of *criteria* for title I—the first in 1967, the second a year later. The criteria include two types of statements: (1) those requiring specific decisions on program design, implementation, and evaluation; and (2) those re-

quiring an assurance from the local school district that it has considered such priorities as the various needs of educationally deprived children, the need for regular school year and summer programs, and the relationship of the title I program to the regular school program. The criteria now in effect, published in 1968, cover the following areas: selection of eligible attendance areas, comprehensive needs assessment, planning, program design, implementation of the title I program, evaluation, and the use of title I money to supplement rather than supplant State and local funds.

Although the Office of Education has issued more than 70 program directives (formerly called program guides) about title I, only 10 to 20 of these are active at any one time. The *program directives* are policy statements sent to the Chief State School Officer of each State; he is responsible for seeing that the information is passed on to local school officials. Many of the program directives deal with financial and survey information applicable only for the fiscal year in which they are issued. Others become outdated as new directives are issued. Each local school district should have a complete file of title I program guides and directives. Parents may want to look through this file to understand the history of title I and how present policies developed.

Overseeing State and Local Title I Programs

Items 5 and 6 at the beginning of this chapter dealt with the Federal Government's responsibility to oversee State and local title I programs. Staff members of the operations branches monitor these programs by visiting each State at least once a year. During such a visit Federal employees examine State title I records, talk with State education officials, and visit several title I projects within the State. They review their findings with the State title I coordinator and his staff, offering assistance to overcome any problems they may have found. In addition, specialists from the Division of Compensatory Education's Program Support Branch are also available to help. Staff members from this branch conduct periodic workshops in different parts of the country to keep State and local title I staff members up to date about title I rules and policies.

Part of the monitoring of title I programs involves fiscal audits conducted by the U.S. Department of Health, Education, and Welfare, of which the Office of Education is a part. Each State is audited about once every 3 to 4 years. An *audit* is primarily concerned with financial records to insure that title I

funds have been properly spent. Parents should find out when the latest audit in their State took place and what the results of that audit were.

Publishing Information About Title I

Just as each State must submit an annual report about its title I program to the Office of Education, the Office itself must give Congress a report once a year about the title I program nationwide. Congress may also require other reports. For instance, in 1972 the Office of Education had to submit a report on how funds were allocated under title I, including an evaluation of how well States divided their title I money among local school districts and how well local districts selected project areas. All these reports become public information once they are submitted to Congress.

In addition to these required reports, the Office of Education publishes a wide variety of materials to help educators and interested citizens know more about title I. Among the books parents may want to have a copy of are:

1. *Questions and Answers: Programs for Educationally Deprived Children Under ESEA Title I.*—This envelope-size booklet contains about 70 questions and answers about the local title I program. It deals with the eligibility of school districts, children, and projects, applications for funds, allocation of funds, and records and reports required by title I.

2. *Questions and Answers: Migrant Children Under ESEA Title I.*—Using the same format as #1, this booklet answers commonly asked questions about the title I program for migrant children.

3. *Questions and Answers: Neglected and Delinquent Children Under ESEA Title I.*—This booklet deals with the title I program for children in State or local institutions for the neglected or delinquent.

4. *History of Title I.*—Revised in 1972, this book describes how title I has changed since its passage in 1965. It includes chapters on the grant structure, eligibility for title I, legal program requirements, and Federal rules.

5. *Compilation of Legislation on Title I.*—This book puts together the original legislation and all the amendments for title I.

6. *Children at the Crossroads.*—This large book tells the story of migrant education programs funded under title I. Complete with pic-

tures, it describes the hard time migrants have and how they can be helped.

7. *Meeting Parents Halfway*.—This book outlines the training program developed in Spokane, Wash., to help parents and teachers understand each other.

8. *Parental Involvement in Title I ESEA*.—This is a handbook for local school officials explaining the history of, the need for, and ways of implementing a strong parental involvement program.

9. *Title I ESEA Case Studies*.—Case studies of selected title I projects in Buffalo, N.Y., Tucumcari and Albuquerque, N. Mex., Williamsburg,

S.C., and Milwaukee, Wis., describe different ways of helping educationally deprived children. A separate booklet for each project describes how the project was planned, implemented, and evaluated.

Other booklets dealing with title I have been mentioned elsewhere in this book. In addition, the Office of Education publishes many general education booklets which may be of interest to parents. These include annual statistical reports on the status of public education, projections of educational statistics for the next decade, and general summaries of the types of programs financed by the Office of Education.

How Does a School District Get Title I ESEA Funds?

Title I ESEA is a Federal aid to education program involving three levels of government. Some grants are for State-operated programs, others for local title I programs. Parents will be particularly concerned with the funding process for local programs.

The U.S. Office of Education, through its National Center for Educational Statistics, figures out how much money each county will get according to how much money Congress has made available for title I programs. The amount Congress sets aside for title I each year is the *appropriation*.

Each State Education Agency (SEA) divides the county grants among school districts within each county. This process is called suballocation.

In some cases, school districts may also receive special grants under title I—incentive grants or grants to urban and rural areas with many poor children. Each school district must submit an application to the State explaining how its title I funds will be used.

This chapter explains these steps in detail.

In discussing the title I funding process, it is important to understand some commonly used words. Title I funds are appropriated each fiscal year. A *fiscal year* is not the same as the calendar year: it runs from July 1 to the following June 30, rather than from January 1 to December 31. The abbreviation *FY* stands for fiscal year.

SEA is an abbreviation for State education agency. Each State has an Office responsible for overseeing the use of title I funds and most other school programs. In different States, the SEA may be referred to as the *Department of Education*, or the *Department of Public Instruction*, or known by some other name.

LEA stands for local education agency, another name for a local school district. Although LEA

is usually used in the law, this book most often uses the term local school district.

Other terms are explained within the context of the chapter.

DETERMINING COUNTY GRANTS

In determining the amount available for local title I programs, the law says the Commissioner of Education should compute basic grants for each county. Actually staff members of the National Center for Educational Statistics, a part of the U.S. Office of Education, decide how much title I money each county is eligible to receive. They use data provided by the Census Bureau.

To receive title I funds a county must have at least 10 children in one or a combination of the following categories:

1. Children aged 5 to 17 from families with an annual income below \$2,000, as determined by the latest census.
2. Children aged 5 to 17 from families receiving Aid to Families With Dependent Children (AFDC), excluding those included in category 1.
3. Children in locally run institutions for the neglected or delinquent.
4. Children in foster homes supported by public funds within the county.

This is the first step parents should look at to be sure their local school district is getting its fair share of title I funds. Be sure all eligible families are on the AFDC list. Figure 4 on page 53 shows the total number of children in these four categories in fiscal year (FY) 1972.

To determine the maximum title I grant a county may receive, add up the number of children in the four categories. Multiply the sum by one-half the State or national average per-pupil expenditure,

TABLE 3.—Average Per-Pupil Expenditures, by State: Fiscal Year 1972

State	Average	State	Average
Alabama*	\$237.16	Montana*	374.60
Alaska	530.46	Nebraska*	\$351.65
Arizona*	340.62	Nevada*	370.40
Arkansas*	240.57	New Hampshire*	346.86
California	392.52	New Jersey	495.54
Colorado*	353.07	New Mexico*	317.32
Connecticut	457.50	New York	632.60
Delaware	421.83	North Carolina*	273.11
District of Columbia	455.64	North Dakota*	310.28
Florida*	350.67	Ohio*	351.42
Georgia*	263.66	Oklahoma*	289.32
Hawaii	407.76	Oregon	436.46
Idaho*	283.32	Pennsylvania	418.30
Illinois	438.75	Rhode Island	447.10
Indiana*	347.98	South Carolina*	258.20
Iowa	393.86	South Dakota*	315.39
Kansas*	366.94	Tennessee*	252.32
Kentucky*	265.74	Texas*	291.44
Louisiana*	291.69	Utah*	306.10
Maine*	327.56	Vermont*	367.53
Maryland	436.82	Virginia*	329.24
Massachusetts	392.36	Washington	413.43
Michigan	437.88	West Virginia*	304.26
Minnesota	446.96	Wisconsin	425.80
Mississippi*	215.59	Wyoming	413.08
Missouri*	334.91		

* These States' averages are below the national average per-pupil expenditure. Therefore, the national average will be used in computing their title I grants. Other States will use their State averages.

whichever is higher. The *average per-pupil expenditure* is the total amount spent on public elementary and secondary education in the State (or Nation) divided by the number of children in grades K-12 in the State (or Nation). The national average per-pupil expenditure rose from \$230.16 in FY 1966 to \$383.48 in FY 1972. Table 3 shows the average per pupil expenditure by State for FY 1972.

The initial figures indicate only the maximum, not the actual, amount of money a county may receive under title I. These maximum amounts are then ratably reduced according to the amount of title I money appropriated by Congress. For instance, theoretically local school districts were eligible for \$3,428,606,117 in title I funds in fiscal year 1972. Congress appropriated less than half that amount or only \$1,406,615,985. Thus, each county received only a part of the money it was eligible to receive.

This is called *ratable reduction*—each county receives the same percentage of money actually appropriated for title I as the percentage it would receive if title I were fully funded. The Office of Education tries to notify SEA's of their title I grants in October or November. Congressional action on appropriation bills may delay this action to early spring.

SUBALLOCATING COUNTY FUNDS

Once the SEA is notified of its total grant for local title I programs, it divides the funds among eligible school districts in each county. To be eligible for title I funds, a school district must have at least 10 children in the 4 categories listed on page 51.

Eight States do not have to suballocate county grants because there is only one school district for each county in the State; i.e., where these boundaries are not the same, the money is divided according to

Use this space for recording the number of children in each category in your school district. Parents may get this information from local school officials.

FIGURE 4.—Number of Children Counted in Determining Grants for Local School Districts Under Title I Fiscal Year 1972

	Millions
	0 1 2 3 4 5 6 7 8
Total	8,109,501
Low income	4,948,119
AFDC	2,921,631
Foster children	171,416
Institutionalized	68,335

the total number of children in the four categories on page 51. AFDC or census data indicating income figures are generally the best sources for determining the *current* distribution of such children, although other data sources may be more accurate in certain States. If more than one data source is used, more emphasis should be given to the most accurate source of information.

It is extremely important for parents to find out how the SEA suballocates funds and to determine whether the method used is the best indicator of how many needy children are in each school district.

Nearly half the States use both AFDC and census data to compute local grants. Some also use enrollment figures as a factor in determining title I grants.

Although an SEA may use different methods to suballocate funds in different counties, the method must be the same for all school districts within one county.

Use the space below to describe the method your SEA is using in dividing county grants among local school districts.

SPECIAL GRANTS FOR LOCAL SCHOOL DISTRICTS

When the annual amount appropriated for title I is more than \$1.397 billion, as it was in FY 1971 and 1972, some school districts may receive extra money under title I through two special types of grants.

The first type of grant is an incentive grant, available to States which do better than the national average in supporting public education. This average is called the *national effort index*; it is the sum of all non-Federal money spent on elementary and secondary education divided by the total personal income in the United States (or the State in figuring out the State-effort index). The U.S. Department of Commerce provides the statistics needed to figure out this ratio. A State may receive a maximum of \$1 per eligible title I student for each one-hundredth of a percent by which it surpasses the national effort index.

In FY 1972, \$7,280,737 in title I funds were given as incentive grants to 22 States—Alaska, Colorado, Delaware, Idaho, Iowa, Maine, Maryland, Michigan, Minnesota, Montana, New Jersey, New Mexico, New York, North Dakota, Oregon, South Dakota, Utah, Vermont, Washington, West Virginia, Wisconsin, and Wyoming.

Eligible States must submit an application to the U.S. Office of Education explaining how the incentive grants will be distributed to local school districts. The law says school districts most in need of financial help should receive the money, and the Office of Education requires that a school district receiving an incentive grant have an effort index at least equal to that of the State and that the district be willing to use the money for an innovative title I project.

The second type of grant goes to urban and rural school districts with large numbers or a high percentage of poor children. To qualify, a district must satisfy one of the following conditions: (1) It must have at least 5,000 poor children and the 5,000 must be 5 percent of the school-age children in the district; or (2) at least 20 percent of the children in the district aged 5 to 17 must be from low-income families. In a few cases school districts with almost enough

poor children to be eligible for this special grant may receive extra funds. For this to happen both the SEA and the Commissioner of Education must agree that a school district really needs the money.

Fifteen percent of the difference between the actual title I appropriation and \$1.397 billion may be used for grants to school districts with many poor children. No district may receive a special grant equal to more than 15 percent of its regular title I grant.

In FY 1972, \$24,572,538 went to such school districts. Only four States—Delaware, Idaho, Nevada, and North Dakota—had no local education agencies receiving such grants.

In most cases this extra money must be used for elementary school programs. However, a school district may use the grant for a high school program if:

1. There is an urgent need for a program at the secondary level.
2. The district can indicate the high school program will be at least as effective as a program at the elementary level might be.

STATE TITLE I GRANTS

The original legislation for title I, Public Law 89-10, only approved funds for local title I programs and costs to the State education agency for administering the local programs. Later the law was amended to provide funds for State programs. These statewide programs were for specific groups of children—migrant children and children living in State institutions for the handicapped, neglected, or delinquent. The U.S. Department of the Interior (Bureau of Indian Affairs) also began receiving funds to operate title I programs on Indian reservations. The SEA may plan and administer some of these statewide programs in cooperation with some other State office, but it is the SEA which has the legal and financial responsibility for all title I activities.

The SEA may also use up to \$150,000 or 1 percent, whichever is higher, of the State title I allocation to cover the costs of overseeing title I programs.

Table 4 gives a complete breakdown of all title I appropriations for FY 1972. Both national and State figures are included.

TABLE 4.—Title I ESEA Appropriations, Fiscal Year 1972

	Part A				Part B		Part C		Grand total				
	Dependent and neglected children in institutions (State agencies)				Special incentive grants	Special grants for urban and rural school districts		State administration					
	Local educational agencies	Handicapped children (State agencies)	Juvenile delinquents in institutions (State agencies)	Migratory children (State agency)		Adminis- tration	Local educational agencies			Adminis- tration			
Total	\$1,406,615,985	\$56,380,937	\$18,044,820	\$2,167,846	\$64,822,926	\$17,307,696	\$1,565,415,210	\$7,280,737	\$24,572,538	\$231,515	\$24,804,053	\$17,539,211	\$1,597,500,000
District of Columbia	1,364,707,215	55,978,666	17,705,057	2,167,846	64,822,926	16,935,605	1,522,317,315	7,280,737	24,572,538	231,515	24,804,053	17,167,120	1,554,402,105
Alabama	40,257,134	560,648	279,173	589,025	415,560	42,102,840	1,003,889	9,729	1,013,618	426,589	43,116,458
Alaska	2,054,974	77,447	150,000	2,282,421	42,739	31,991	31,991	150,000	2,357,151
Arizona	8,648,415	373,893	286,460	1,742,533	150,000	11,201,301	95,202	95,202	150,000	11,296,503
Arkansas	24,214,456	906,163	232,005	622,388	259,750	26,234,762	555,693	5,557	561,250	265,307	26,796,012
California	122,028,439	1,477,445	1,847,592	8,541,235	1,338,947	135,233,658	1,780,269	17,803	1,798,072	1,356,750	137,031,730
Colorado	10,100,532	1,146,605	153,775	30,678	1,261,649	150,000	12,843,239	116,611	119,467	119,467	150,000	13,079,317
Connecticut	11,813,005	1,220,152	122,610	44,835	589,260	150,000	13,939,862	20,500	144,993	144,993	150,000	14,084,855
Delaware	2,242,296	577,485	102,083	254,785	150,000	3,326,649	150,000	3,347,149
Florida	26,445,029	1,322,239	470,913	9,231,131	374,693	37,844,005	487,793	4,878	492,671	379,571	38,336,676
Georgia	39,947,788	474,365	401,887	445,220	412,693	41,681,953	893,376	8,934	902,310	421,627	42,584,263
Hawaii	3,250,669	212,443	19,572	6,116	150,000	3,638,800	88,039	88,039	150,000	3,726,839
Idaho	2,730,118	137,286	77,079	753,155	150,000	3,847,638	15,356	150,000	3,862,994
Illinois	63,243,090	3,065,108	921,814	623,025	679,829	68,662,736	1,096,384	10,964	1,107,348	690,793	69,770,084
Indiana	16,999,801	1,766,309	310,614	129,870	604,364	198,353	20,033,605	98,733	987	99,720	199,340	20,133,325
Iowa	15,464,659	634,115	120,127	113,826	84,286	164,170	16,581,183	665,366	852,374	580	853,954	164,750	17,310,527
Kansas	10,427,273	866,665	126,165	535,338	150,000	12,105,441	102,522	102,522	150,000	12,207,963
Kentucky	37,131,906	455,958	45,634	73,628	377,071	38,084,197	852,374	8,475	860,849	385,546	37,915,587
Louisiana	34,683,312	1,344,864	375,810	404,571	368,086	37,176,643	732,285	6,659	738,944	374,745	37,578,766
Maine	5,607,754	452,890	114,277	53,687	150,000	6,378,608	165,950	34,208	3,100	313,046	150,000	6,578,766
Maryland	19,423,141	589,707	507,148	510,643	210,306	21,240,945	10,853	309,946	2,738	276,505	213,406	21,564,844
Massachusetts	25,858,101	2,504,434	244,833	245,225	268,526	27,121,119	1,092,111	273,767	6,204	280,971	271,264	27,397,624
Michigan	47,708,517	2,841,841	501,373	3,782,427	546,498	55,196,289	1,092,111	620,387	3,386	623,773	230,417	56,914,991
Minnesota	21,120,043	890,344	325,834	9,633	372,318	227,085	22,935,624	1,092,111	338,559	1,091	1,109,298	45,011,306	24,365,680
Mississippi	42,074,152	302,182	229,321	861,680	434,673	43,902,008	1,098,387	10,911	1,109,298	283,887	45,011,306
Missouri	25,579,100	1,602,563	359,321	385,014	279,260	28,205,258	462,652	4,627	467,279	283,887	28,672,537
Montana	3,013,338	202,861	85,576	42,950	722,476	150,000	4,217,141	249,587	4,479	4,479	150,000	4,471,207
Nebraska	7,523,056	289,527	101,239	34,897	239,675	150,000	8,338,394	67,546	67,546	150,000	8,405,940
Nevada	883,771	115,044	92,802	32,212	150,000	1,273,829	1,026	1,026	150,000	1,273,829
New Hampshire	1,908,409	243,510	71,711	19,941	150,000	2,393,571	150,000	2,393,571
New Jersey	44,860,594	3,340,931	602,577	1,830,525	506,346	51,140,973	44,974	805,184	7,870	813,054	514,216	51,999,001
New Mexico	9,629,504	298,731	105,457	842,122	150,000	11,025,814	327,240	173,918	173,918	150,000	11,576,972
New York	193,459,929	7,253,392	1,849,722	22,774	2,403,247	2,049,891	207,038,955	1,092,111	4,156,486	41,406	4,197,892	2,091,297	212,328,958
North Carolina	56,260,988	1,870,999	189,113	1,280,056	602,312	60,833,468	1,247,117	12,471	1,259,588	614,783	62,093,056
North Dakota	4,271,181	312,536	51,770	631,592	150,000	5,417,079	146,676	150,000	5,563,555
Ohio	41,269,978	638,494	851,709	129,616	1,255,897	441,457	44,587,151	609,843	6,098	615,941	447,555	45,203,092
Oklahoma	18,199,914	497,757	144,188	141,888	640,412	196,242	19,820,401	385,907	3,835	389,742	200,077	20,210,143
Pennsylvania	9,382,231	854,152	239,617	1,641,090	150,000	12,267,090	481,829	1,055,355	10,545	1,065,900	150,000	12,819,571
Rhode Island	67,113,702	4,575,784	769,672	219,608	514,091	731,929	73,924,786	1,055,355	10,545	1,065,900	742,474	74,990,686
.....	402,390	20,120	81,372	2,683	150,000	5,845,803	54,942	54,942	150,000	5,900,745

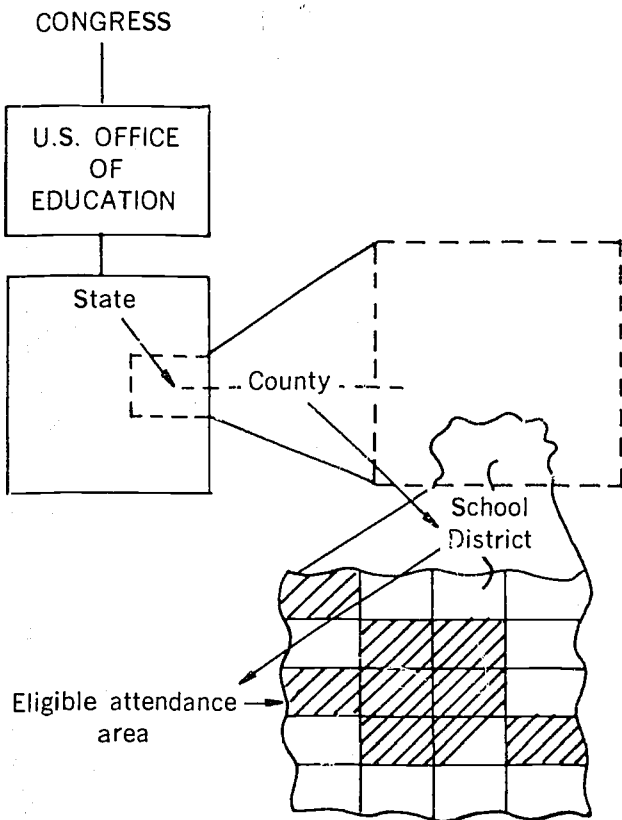
South Carolina	34,313,120	824,482	264,218	61,357	533,421	359,966	36,356,564	822,953	8,230	831,193	368,196	37,187,757
South Dakota	6,266,048	190,973	44,484	31,062	150,000	6,682,567	21,942	21,942	150,000	6,870,111
Tennessee	36,288,395	633,892	461,326	233,156	266,902	378,837	38,262,508	846,777	8,468	855,245	387,305	39,117,753
Texas	69,566,731	2,243,741	821,414	475,132	16,094,656	892,017	90,093,691	1,359,839	13,598	1,373,437	905,615	91,467,128
Utah	3,593,198	317,521	100,472	218,584	150,000	4,379,775	21,287	21,287	150,000	4,564,602
Vermont	2,107,682	291,828	65,959	5,369	150,000	2,620,838	11,893	11,893	150,000	2,743,751
Virginia	33,803,541	735,515	585,574	645,013	357,696	36,127,339	657,543	6,575	664,118	364,271	36,791,457
Washington	12,255,022	1,287,421	419,218	1,833,149	157,948	15,952,758	141,348	1,413	142,761	159,361	16,597,706
West Virginia	20,524,496	379,645	187,905	23,009	165,663	212,807	21,493,525	69,084	4,095	413,592	216,902	21,976,201
Wisconsin	16,546,374	1,730,025	381,517	39,174	438,574	191,357	19,327,021	585,239	1,379	140,145	192,736	20,052,405
Wyoming	1,235,793	167,297	61,549	33,459	161,927	150,000	1,180,025	2,174	2,174	150,000	1,932,250
District of Columbia ..	8,187,278	554,514	253,336	140,337	150,000	9,285,465	221,740	221,740	150,000	9,507,205
American Samoa	333,046	25,000	358,046	25,000	358,046
Guam	902,004	43,717	25,000	970,721	25,000	970,721
Puerto Rico	26,521,556	358,554	329,026	272,091	27,481,227	272,091	27,481,227
Trust Territories	1,049,404	25,000	1,074,404	25,000	1,074,404
Virgin Islands	523,392	10,737	25,000	559,129	25,000	559,129
Dept. of Interior, BIA ..	12,477,000	12,477,000	12,477,000
Unallotted	102,368	102,368	102,368
National Advisory Council on Education of Disadvantaged 75,000	75,000

† \$1,900,000 of this amount reserved for the migrant student record transfer system.

What Schools Offer a Title I Program?

Figure 5 illustrates the process of getting title I funds from the Federal Government to local school districts. Congress appropriates the money. The U.S. Office of Education determines how much each eligible county will receive and sends the money for all the eligible counties in each State to the State education agency. Then the SEA divides each county's share among school districts within the county. This is the point at which the last chapter stopped.

FIGURE 5.—Getting Title I Funds to Local Schools



Once school districts know how much title I money they will get, they must decide which schools in the district will be project areas. A *project area* is an attendance area whose children will get title I services. An *attendance area* is the neighborhood from which a school gets its students. Most school districts assign children to certain schools on the basis of geographic boundaries. The area within the boundaries for each school is an attendance area. Under title I eligible *attendance areas* are those with more or a higher percentage of children from low-income families than the average attendance area in the school district has.

The process for selecting eligible attendance areas and project areas is one of the most difficult tasks in planning a title I program. Parents must be sure that school officials follow the right procedure in determining these areas.

The U.S. Office of Education published a handbook for local school officials describing this process. Every parent council should have a copy of the handbook entitled "Title I ESEA Selecting Target Areas."

There are eight steps involved in determining eligible attendance areas:

1. Decide what data are the best indicators of where poor children live.
2. Collect data.
3. Fit the data to school attendance areas.
4. Weigh multiple data sources.
5. Figure out the number and percentage of poor children in each area.
6. Rank the areas.
7. Figure out the percentage and average number of poor children in the district as a whole.
8. Select eligible attendance areas.

These steps are explained in this chapter.

DATA SOURCES

To find out which school attendance areas are eligible for title I, a school district needs two essential pieces of information—the total number of school-age children living in the attendance area and the number or percentage of those children who come from poor families.

Most school districts will know how many children live in each attendance area. This number should include children attending nonpublic schools, dropouts, and children in institutions for the neglected or the delinquent.

The number of children who come from poor families is harder to determine. Title I is often referred to as a program for poor children, but there is no way of finding out if children are poor. Actually, the law talks about children from low-income families; that is, families with an annual income of less than \$2,000.

There are a number of ways of finding out how many low-income families live in different parts of a school district. The best sources are census and Aid to Families with Dependent Children (AFDC) data. A school district may use only one source of information or several in counting children from low-income families, but it must use the same data sources for all attendance areas.

Census Data

The U.S. Census Bureau conducts a national census every 10 years; this is called the Census of Population and Housing. The census includes a special calculation of poverty based on family size and income as well as data on ethnic groups, income levels, employment, housing, and numbers of children. The most useful information for a school district deciding which areas should receive title I services will be the number of families with incomes below \$2,000, \$3,000, and \$4,000. Using this information, school officials can find out the number of children from low-income families by multiplying the number of children in an area by the percentage of low-income families. For instance, if there are 432 families and 1,350 children in an attendance area and the census indicates 108 families in the area have incomes below \$2,000, then 25 percent of the families are poor. Multiply the 1,350 children by 25 percent and you get a total of 337½ poor children.

In rural areas of the country census data are gathered according to geographic areas known as *enumeration districts*. Because these districts often have

the same boundaries as townships, the boundaries will probably coincide with school district lines.

This is not true in urban areas where census data are collected in larger blocks. There are 247 Standard Metropolitan Statistical Areas (SMSA's) in the country; the Census Bureau divides these areas into census tracts or blocks in reporting information about the areas. A *census block* is usually the same as a city block. A *census tract* is an area where an average of 4,000 people live. School district officials must ask the Census Bureau to take information gathered by census block and tract and apply it to school district boundaries or do this data application themselves. *Title I ESEA Selecting Target Areas* describes how census data can be determined for each attendance area.

AFDC Data

While census data probably give the most complete information about the location and number of low-income families, at the end of the 10 years for which the data are used the information will no longer be up to date. Therefore, it may be necessary for school officials to find more current figures in counting the number of poor children in each attendance area.

Since income levels and the number of children in the family determine whether or not a family receives AFDC, it is natural that the office in charge of AFDC, usually the city, county, or State welfare office, has facts and figures on the number of poor children in the school district. Some States make the number of AFDC children, by street address, available each year. School officials may need to take this AFDC data and apply it to school attendance areas; in some cases the welfare office may do this. *Title I ESEA Selecting Target Areas* describes this process.

The difficulty with AFDC data is that they do not include all families with low incomes. Some families may not have lived in the area long enough to qualify for AFDC help. Others may be too proud to ask for help. Therefore, school officials should find some other way of counting poor families without AFDC aid and use this information along with the AFDC data.

Other Data Sources

Health, employment, food program, and parental survey data can also be helpful in determining the number of children in each attendance area. A parental survey, asking parents questions about family income and number of children, would probably be

the easiest way to count poor children in a school district. But some parents may not want to answer such questions; they may not be able to answer them; or the answers may be incomplete or inaccurate. However, a survey, particularly if it is done as part of a home visit by a teacher, can be helpful, especially in identifying low-income families who do not get AFDC payments. Title I parents can encourage other parents to cooperate with such a survey so all eligible children are counted.

Many health statistics, including infant mortality and the use of free clinics, reflect where poor families live. However, it is hard to relate this data to number of children so this information should be used only in combination with other data.

Because the free lunch program is for poor children, counting the number of children getting free lunch in each school is a good indication of the poor children in the school. But this figure is still incomplete. Many nonpublic schools do not have free lunch programs. Some public school children do not sign up for free lunches. Like all the above sources, free lunch statistics should be used with census or AFDC data to be sure they reflect an adequate number of poor children.

Weighing Data Sources

If more than one data source is used in determining the number of children from low-income families in each attendance area, school officials must evaluate the importance and reliability of each data source and give it a weight. Usually census and/or AFDC data will be given the greatest weight.

For instance, if a school district has a low-income, Spanish-speaking population which does not receive AFDC, it might use the following weights: AFDC—80 percent; and Spanish-speaking—20 percent. In a district which has had a sudden growth in the number of low-income families since the last census, the weights might be: census—40 percent; AFDC—40 percent; and free lunch—20 percent.

When using different data source, it is also important to be sure all sources deal with the same unit, for instance, number of children. In the first district described above, you would need the following statistics:

1. Total number of children aged 5 to 17.
2. Total number of children aged 5 to 17 in families receiving AFDC.
3. Total number of children from low-income,

Use this space to describe the data sources your school district uses in determining the number of poor children in each attendance area. Record the weights assigned to each data source if more than one is used.

Spanish-speaking homes who do not receive AFDC.
All data have been turned into number of children.

SELECTING ELIGIBLE ATTENDANCE AREAS

The last four steps listed on page 59 involve selecting eligible attendance areas.

The first thing to do is figure out the number and percentage of poor children in each attendance area within the school district. This is simpler if only one data source was used; if more than one source was used, multiply the number of children in each category by the weight percentage assigned to the data source and add the results.

It is necessary to figure out both numbers and percentages of poor children because there are two ways of determining which schools have the most poor children. For example, school A has 300 students and 120 of them are from low-income families. School B has 100 students and all of them are poor. Some educators and parents will look at these figures and say school A is the poorest because it has more poor children. Others will say school B needs more help because 100 percent of its enrollment are poor.

Title I guidelines say a school district may use either numbers or percentages of poor children to determine which schools are eligible for title I services.

Once the numbers and percentages for each attendance area are computed, school officials must rank the areas. Elementary and secondary school attendance areas may be ranked separately. Then they must figure out the average number of poor children for an attendance area within the district and the percentage of children from low-income families in the whole district.

These district averages and percentages are used to compare the figures for each attendance area. An attendance area with the same number or more children from low-income families than the district average or with an equal or higher percentage of poor children is eligible for title I services. As an example, take a school district with eight attendance areas.

There are 4,600 children in the school district; 1,455 of them are poor. This means there is an average of 181.8 poor children for each attendance area. The percentage of poor children in the district is 31.6

According to these figures, attendance areas C, D, E, G, and H are eligible for title I services based on percentages. Using numbers of poor children, areas A, D, E, and G are eligible. Areas D, E, and G are eligible using either method.

Attendance area	Percentage of poor children	Number of poor children
A	20	200
B	20	160
C	40	100
D	75	300
E	40	320
F	10	50
G	33	200
H	50	125

Six of the eight attendance areas are eligible according to at least one of the title I criteria, but not all of them will be selected as project areas.

SELECTING PROJECT AREAS

Although school officials may use either of two methods to select eligible attendance areas for title I, the actual number of project areas (areas where title I services are offered) cannot be more than the number of eligible areas according to only the number or percentage method of selection. In the aforementioned example, five areas were eligible according to percentages: four were eligible according to numbers of poor children. Thus, the school district may have no more than five project areas, even though there are six eligible areas.

There are three basic rules for selecting project areas:

1. An attendance area must have a higher number or percentage of children from low-income families than the district average.

2. No more attendance areas than either the percentage or numbers ranking alone would provide may be selected as project areas.

3. In most cases, no eligible attendance area should be skipped in selecting project areas. In the above example, this means you could not choose area C as an attendance area instead of area H because H has a higher percentage of poor children than C.

Using these three rules, the project areas for the sample school district would be:

Percentage method—C, D, E, G, H

Numbers method—A, D, E, G

Combination method—A, D, E, G, H

The other possible combination—A, C, D, E, G—would violate rule 3 by skipping H in favor of C.

In some cases the differences in eligible attendance areas selected using one method or the other will vary much more than in the example above. It is then up to the local school district officials to decide whether it is more important to help children from an attendance area with perhaps a smaller number but a higher percentage of children from low-income families or to help areas with large numbers of poor children. Generally, school districts base their selection of project areas on the percentage basis. Parents should know what policy their school district follows.

If there is little difference in the percentage of poor children in attendance areas within the school district, the whole district may be a project area. This can be done only if the difference among attendance areas within the district is much less than the average difference within the State. For instance, a school district may have a difference of only 5 percent, with the percentage of poor children in its attendance areas ranging from 28 to 33 percent. Five other districts in the State have differences of 40, 25, 30, 15, and 60 percent; the average difference in the State is 34 percent, much higher than the district with only a 5-percent variance.

SELECTING TARGET AREAS IN DESEGREGATED DISTRICTS

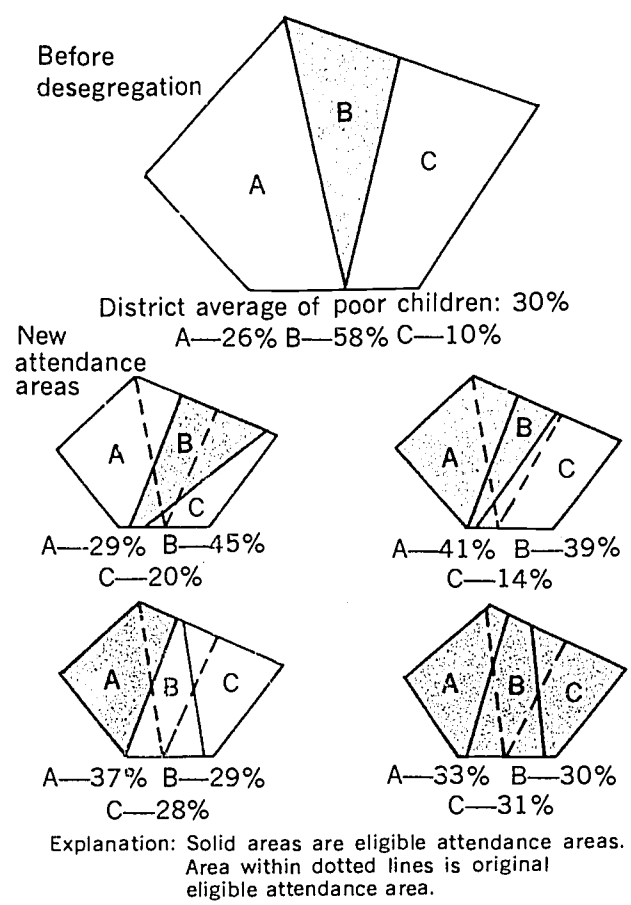
Desegregation caused some problems in the selection of title I target areas in certain school districts. Since some school districts decided school attendance on the basis of race rather than geographic residence, schools rather than attendance areas became project areas. This type of segregation is no longer legal.

As school districts desegregated, some adopted freedom of choice plans which allowed students to choose the school they wished to attend. Title I was sometimes used to discourage children from changing schools; if they transferred, they would lose their title I services. To prevent this, the Federal Government approved a follow-the-child concept. This allowed a child who had been receiving title I services to get such help even if he transferred to a nontitle I school.

The follow-the-child concept is no longer legal in title I. Desegregated school districts must establish new attendance areas and include the change in attendance patterns in their title I application. The process of selecting target areas is then the same as for any other school district. Once new attendance area boundaries are set, school officials should rank the areas according to the number and percentage

of poor children. Areas above the district average are eligible for title I. Figure 6 shows four ways of establishing new attendance area boundaries in a desegregated school district.

FIGURE 6.—Establishing New Attendance Area Boundaries in a Desegregated School District



In some local school districts children residing in eligible attendance areas will be assigned in schools whose attendance areas are not eligible title I attendance areas; e.g., students voluntarily transferring from schools in which they are in a racial majority to schools in which they are in a racial minority. Educationally deprived children transferring under these circumstances are still eligible to receive title I services, and should have their needs assessed along with those of the other children residing within eligible areas.

If a school closes as part of a desegregation plan, the neighborhood served by the school becomes part of another school's attendance area. If, in order to meet desegregation orders, a school district establishes

attendance areas where part of the area is separated from the other part, the number of children in the entire attendance area should be counted in determining eligibility for title I.

Parents should be sure that title I funds are not

being used to promote segregation. On the other hand, they should check to see that the school district is not using title I funds to implement a desegregation plan. Children in title I programs should be chosen on the basis of educational need, not race.

Glossary

This glossary defines some of the words used throughout this book. Although most of the words are defined in the text the first time they appear, the glossary is an easy way to review these definitions when the words appear again.

- 1. Aid to Families With Dependent Children.**—often referred to as AFDC, or ADC, this program provides money to families who do not earn enough to support their children. The amount of AFDC money granted depends on the number of children in the family and the family's income. State AFDC plans are approved under title IV of the Social Security Act.
- 2. Allocation.**—An allocation is the amount of money actually set aside for a State or local school district under title I. (See also Appropriation and Authorization.)
- 3. Application.**—An application is a legal document submitted by the local school district to the State Department of Education for approval. In the case of the title I migrant program the application is submitted by the State to the U.S. Office of Education (USOE). The application describes the district's or State's project. It must include a description of each component making up the title I project a detailed budget, an evaluation plan, and various assurances that all title I rules have been followed.
- 4. Appropriation.**—An appropriation is the amount of money made available by the Congress of the United States to support a national program.
- 5. Attendance Area.**—An attendance area is the geographic area served by a particular school.
- 6. Audit.**—An audit is a review of program and financial records to determine if money has been properly used.
- 7. Authorization.**—The maximum allowable amount which Congress could appropriate for title I according to the formula in the law is called the authorization.
- 8. Average Daily Attendance.**—Average daily attendance is the average number of children in school each day. Every State has its own way of computing average daily attendance. Some States include students who were only in school for a half day while others do not; some include preschool children, others do not.
- 9. Average Per-Pupil Expenditure.**—Average per-pupil expenditure is the total amount of State and local money spent on public elementary and secondary education in the State (or Nation) divided by the number of children in public elementary and secondary schools in the State (or Nation).
- 10. Census.**—The census is a population and housing survey conducted by the Bureau of the Census, U.S. Department of Commerce, once every 10 years. It provides statistics on family income and number of children. This information is used to determine where large numbers of low-income children live.
- 11. Comparability.**—For title I, comparability means that students in title I schools receive as many services (though they need not be the same) from State and local funds as students in non-title I schools.
- 12. Compliance.**—Compliance means having followed all the rules for title I.
- 13. Concentration.**—Concentration means limiting the use of title I funds to the children who have the greatest educational need.
- 14. County.**—A county is a geographic political subdivision within a State. Counties in most States include several school districts.

15. **Educationally Deprived Child**—An educationally deprived child is one who is behind in school. He is not doing the schoolwork expected of children his age because of economic, social, language, or cultural problems.
16. **Effort Index**—The effort index is the amount of all non-Federal money spent on public elementary and secondary education in a State (or Nation) divided by the total personal income in the State (or Nation).
17. **Elementary and Secondary Education Act (ESEA)**—This act (Public Law 89-10), passed in 1965, included provisions under title I to fund projects to help educationally deprived children. Other titles are used to expand school library services, and fund new kinds of education programs. Later amendments provided for bilingual education and dropout prevention programs.
18. **Fiscal Year**—The fiscal year is July 1 to June 30.
19. **Grant**—A grant is the amount of money given to an agency for a particular purpose. Under title I, a grant is given to a State or local education agency to provide special educational services for educationally deprived children in low-income areas when its project application has been approved. The grant cannot be more than the allocation.
20. **Local Education Agency**—For title I, local education agency (LEA) means a board of education or some other legal authority having administrative control over public education in a county, township, or school district.
21. **Low-Income Factor**—The low-income factor is the amount of money a family can earn annually in order for children in that family to be counted in finding out how many children are eligible for title I services. This is used only at the national level for making allocations under the formula prescribed in the law.
22. **Maintenance of Effort**—Maintenance of effort means that the State or local school district must continue to support public elementary and secondary schools within the State (or district) to the same extent or better than it did before title I funds were available.
23. **Migrant Child**—A migrant child is one who crosses school district boundaries during the year as his family does agricultural work. A migrant child may cross district boundaries within the same State (intrastate) or between several States (interstate), so he attends school in more than one school district during the year.
24. **Monitoring**—Monitoring means checking or overseeing to be sure everything is all right or, in the case of title I, that project application and project operations follow Federal and State rules.
25. **Needs Assessment**—A needs assessment is a study of a child's educational problems and how they can be solved.
26. **Onsite Visit**—An onsite visit is a trip to a project location. It may have several purposes—to monitor, to provide technical assistance, or to identify good practices.
27. **Program**—A title I program is all the projects in a school district or State.
28. **Project**—A project is a set of activities designed to correct a specific educational problem of a limited number of educationally deprived children.
29. **Ratable Reduction**—Ratable reduction is the process of giving each State and county its fair share of title I funds by giving them the same percentage they would be eligible to receive if the program were funded at its full authorization.
30. **Regulations**—Regulations are rules for title I. Federal regulations must be published in the *Federal Register* and become effective 30 days after publication. They usually explain or expand on some part of the law. States may also issue rules and procedures for title I, as long as they do not conflict with Federal regulations and law.
31. **State Education Agency**—State education agency (SEA) refers to the officer or office responsible for supervising public secondary and elementary education in the State.
32. **Suballocation**—Suballocation is the way by which a State education agency divides title I funds allocated to each eligible county in the State among school districts within each county.
33. **Supplant**—Supplant means to replace or to be used instead of. Title I funds may not be used to supplant State or local funds for education.

34. **Supplement**—Supplement means to add to. Title I funds should supplement State and local funds for education of a special group of children identified under the title I requirements.
35. **Supportive Services**—Supportive services are noninstructional activities needed to achieve the educational goals of a title I program. Such services might include medical and dental care, transportation, counseling, and food.
36. **Target Areas**—Title I target areas are local attendance areas with a higher number or per-

centage of children from low-income families than the school district average for all attendance areas.

37. **Technical Assistance**—Technical assistance is expert help.
38. **Title I ESEA**—Title I ESEA is the largest Federal aid to education program. It provides monies to State and local education agencies to finance special educational programs for educationally deprived children in areas with many low-income families and for Indian, migrant, and institutionalized children.