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ABSTRACT

Intended to serve a wide range of readers, this multi-author summary report of what is commonly referred to as the "District Practices Study" (1976-82) of Title I of the Elementary and Secondary Education Act contains information of special concern to administrators of federally funded programs, legislators, and other policymakers. The report marks the conclusion of phases I and II of the study's three projected phases. Following chapter 1's overview of the study's findings, chapter 2 describes the project's study design and provides a profile of the Title I program at the school district level. Chapters 3 and 4 examine school and student selection; chapter 5 discusses local Title I program project designs and staffing patterns. After chapter 6's analysis of parental involvement in local Title I programs, the four concluding chapters consider the local administration of the program's fiscal requirements, the interaction of school district officials with state education agency officials, nonpublic school students' participation in Title I, and local Title I evaluation and technical assistance. Also included are an appendix on the study design for the study's first two phases and a bibliography. (JBM)

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**Advanced
Technology**

**LOCAL OPERATION
OF
TITLE I, ESEA 1976 - 1982:
A RESOURCE BOOK**

Advanced Technology, Inc.
7923 Jones Branch Drive
McLean, Virginia 22102

Submitted To The
**Planning and Evaluation Service
U.S. Department of Education**

JUNE 1983

**SPECIAL REPORTS FROM THE
TITLE I DISTRICT PRACTICES STUDY**

**CURRENT TITLE I SCHOOL AND STUDENT SELECTION
PROCEDURES AND IMPLICATIONS FOR
IMPLEMENTING CHAPTER 1, ECIA**

*Michael J. Gaffney
and Daniel M. Schember*

**THE EFFECTS OF THE TITLE I
SUPPLEMENT-NOT-SUPPLANT AND EXCESS COSTS
PROVISIONS ON PROGRAM DESIGN DECISIONS**

*Michael J. Gaffney
and Daniel M. Schember*

**THE INFLUENCE OF TITLE I BUDGET CUTS ON LOCAL
ALLOCATION DECISIONS: SOME PATTERNS FROM PAST
AND CURRENT PRACTICES**

Richard Apling

**NONPUBLIC SCHOOL STUDENTS IN TITLE I,
ESEA PROGRAMS: A QUESTION OF "EQUAL" SERVICES**

Richard Jung

**PAPERWORK AND ADMINISTRATIVE BURDEN FOR
SCHOOL DISTRICTS UNDER TITLE I**

*Victor Rezmovic
and J. Ward Keesling*

**TECHNICAL ASSISTANCE AND LOCAL PROGRAM
IMPLEMENTATION IN TITLE I, ESEA**

Brenda J. Turnbull

**TITLE I SERVICES TO STUDENTS ELIGIBLE FOR
ESL/BILINGUAL OR SPECIAL EDUCATION PROGRAMS**

*Maryann McKay
and Joan Michie*

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PREFACE

In 1980, the Department of Education [ED] contracted with Advanced Technology, Inc. to conduct a national study of school district practices since 1978 for operating programs under Title I of the Elementary and Secondary Education Act [ESEA]. This study, "A Description of District Practices since 1978 under Title I of the Elementary and Secondary Education Act of 1965," is commonly referred to as the Title I District Practices Study.

One goal of this study was to describe how local districts operated projects funded by Title I, ESEA in the 1981-82 school year. A second, related goal was to document local educators' rationales for their program decisions, their perceptions of the problems and benefits of requirements contained in the 1978 Title I Amendments, and their assessments of the expected effects of Chapter 1 of the Education Consolidation and Improvement Act [ECIA] on school districts' operation of Title I projects. The study was designed specifically to draw cross-time comparisons with the findings of the Compensatory Education Study conducted by the National Institute of Education [NIE] and to provide baseline data for subsequent analyses of the administration of Chapter 1, ECIA.

During the planning year for this project (Phase I), relevant background materials were reviewed, an advisory panel was formed, the study's research questions were refined, districts were selected for the study's four samples, data collection

instruments were designed and approved, and a detailed analysis plan was prepared. This summary report and eight special reports (see p. ii) present the findings from the data collection and analysis phase of the study (Phase II). These reports synthesize data collected from a mail questionnaire sent to Title I Directors in more than 2,000 randomly selected school districts, structured interviews and document reviews in 100 nationally representative Title I districts, and indepth case studies in 40 specially selected Title I districts.

During Phase III, detailed descriptions of solutions to several types of problems faced by local school officials operating Chapter 1, ECIA programs will be developed. These technical assistance materials will focus on describing useful strategies for serving nonpublic and secondary school students, designing inclass projects, and using teacher judgement scales in combination with objective data sources for making student selection determinations. These descriptions will be presented in a separate document, scheduled for completion by September 1983..

To meet the objectives of Phases I and II of the study, a special project staff was assembled within Advanced Technology's Social Sciences Division. That staff, housed in the Division's Program Evaluation Operations Center, oversaw the study design, data collection and processing, data analysis, and report preparation.

The summary report reflects the efforts of many staff members, contractors, consultants, advisory panel members, and

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CHAPTER 1
HIGHLIGHTS

INTRODUCTION

The Title I District Practices Study documents how local school districts operated projects funded by Title I of the Elementary and Secondary Education Act. It also describes local educators' rationales for their program decisions and their perceptions of the problems and benefits of the requirements contained in the 1978 Title I Amendments.

The study was originally conceived to inform the 1982-83 reauthorization hearings for Title I. It was to compare the local operation of the program under the legal framework established in the 1978 Title I statute with earlier descriptions of the program's implementation, especially those documented in the Compensatory Education Study conducted by the National Institute of Education in the 1976-77 school year. The passage of Chapter 1 of the Education Consolidation and Improvement Act in the summer of 1981, however, precipitated a refocusing of the study's objectives.

While Chapter 1 maintains the Title I goal of providing "financial assistance to state and local agencies to meet the special needs of educationally deprived children," Congress intended that under Chapter 1, the program be implemented "in a manner which will eliminate burdensome, unnecessary, and unproductive paperwork and free the schools of unnecessary Federal supervision, direction, and control." Some of Chapter 1's

provisions pertaining to the local operation of the program, such as those for nonpublic school student participation, remain essentially unchanged. Others, however, such as those governing selection of eligible and participating schools and students, application procedures, as well as certain funds allocation and evaluation requirements, are substantially changed. Still other Title I provisions, such as those pertaining to parent advisory councils [PACs], are completely eliminated by the Chapter 1 legislation.*

Accordingly, the design of this study was refined to collect three types of information: descriptions of current district practices; retrospective data for cross-time comparisons; and prospective information about the anticipated effects of the new legislation.

The District Practices Study used a complementary set of three data collection strategies to cross-validate findings:

- A mail questionnaire sent to Title I Directors in over 2,000 nationally representative school districts
- Structured interviews and document reviews in 100 nationally representative Title I districts
- Case studies in 40 specially selected districts to examine more closely the interactions between school and district-level staff responsible for implementing state and Federal categorical programs, and to study in-depth Title I services to nonpublic school students

*However, the conference report accompanying Chapter 1 states that "it is an option of the local educational agencies to continue using PACs to comply with the consultation requirement" (p. 748).

These three data collection efforts were undertaken from the late fall to early spring of the 1981-82 school year. This was a time of some uncertainty in many school districts. Many respondents, particularly in small districts, were unfamiliar with the specific legislative changes of Chapter 1. Most districts were anticipating guidance from state and Federal officials to assist them in understanding the implications of this new law in planning for their 1982-83 school year programs. Many districts also were anticipating funding cuts for the first time in their Title I programs.

REPORTS OF STUDY FINDINGS

The findings from the Title I District Practices Study are reported in two ways: (1) this resource book, which covers a wide range of topics in the administration of Title I projects, and (2) a series of seven special reports that examine particular topics in greater depth. (The titles of the special reports are listed on page ii).

This resource book is intended to serve a wide range of readers. It contains information on several topics of concern to administrators of federally funded programs and to policymakers who shape the legislation and regulations that guide the implementation of such programs. To enhance the utility of the document, we have taken certain steps to make the information more accessible. Each chapter begins with a page of highlighted findings, organized under the research questions that guided the inquiry in that area. This page is printed on a different color paper to make it easy to access.

The Highlights chapter of this report is also printed on a different color of paper to distinguish it from the body of the report. It contains four major sections: an introduction to the study, a description of the reports from the study, a synopsis of the findings from the study, and a topical index to assist the reader in finding information about subjects of interest that may appear in more than one of the subsequent chapters.

SYNOPSIS OF STUDY FINDINGS

The findings presented here are organized under the headings of the chapters that appear later in the volume. This synopsis is highly condensed and omits many nuances that may be important to particular interpretations. The reader is encouraged to pursue topics of interest in greater depth in the relevant chapters of this volume or in the special reports. The topical index may also be helpful in locating information about related findings that would also influence interpretations.

Profile of Title I

To provide a context for findings about the management practices of districts implementing Title I projects, the study gathered information on the scope and nature of the services provided to Title I students and the administrative activities of project staff.

Scope of Services

During the 1981-82 school year, more than 90 percent of the nation's school districts operated Title I projects, and an

estimated 4.8 million students (including neglected or delinquent and nonpublic students) received Title I services. Since the 1979-80 school year, there has been a decline of 12 percent in the number of served students which probably results from both declining enrollments and the shrinking purchasing power of level funding for the program in a time of severe inflation.

Nature of Services

Nearly all of these projects provided services in reading and two-thirds reported that they provided services in mathematics. Nearly three-fourths of the students served were in grades 1 through 6. Ninety-two percent of the districts used pullout designs, while 30 percent employed inclass models.

Local Administration

Nearly three-quarters of the districts with Title I projects have a total enrollment of fewer than 2,500 students. These districts rarely have more than one administrator for the program, and nearly three-quarters of them reported that administration of their Title I projects required less than 26 percent of their time.

Administrative Burden

Title I Directors reported that one-fourth of their administrative time was spent on preparing applications or reports and an equal amount of time was spent on managing or supervising the instructional program. They generally felt that Federal requirements regarding evaluation and student selection were necessary to achieve the program goals but that they also created administrative burdens. On the other hand, they found that requirements

for documenting comparability and for parental involvement were both unnecessary and burdensome.

School Selection and Targeting

Under Title I, a school district generally was required to use its Title I funds only in "school attendance areas having high concentrations of children from low-income families." Furthermore, districts were usually required to rank attendance areas by poverty concentration, using the best available poverty measure(s), and serve these areas in order from highest to lowest. Chapter 1 of ECIA altered these requirements somewhat, and district officials were asked to comment on the changes that might result.

Method of School Selection

In nearly three-fourths of the districts with Title I projects, services were offered in all eligible schools. Eligibility was most often determined by the count of free or reduced price lunches taken at each school. However, 64 percent of the Directors said they would prefer to use achievement data. The most frequently used school selection option was ranking by grade span, although other options were also used by substantial percentages of districts. Many districts, however, seemed unaware of the range of options available to them.

Anticipated Effects of Chapter 1, ECIA on School Selection

Just over half of the school districts believed that they would have the same flexibility in selecting schools under Chapter 1 that they had under Title I. However, a similar percentage

were concerned that the changes under Chapter 1 would make it more difficult to achieve the program's targeting goals.

Student Selection

From the student populations of schools chosen to receive Title I funds, districts had to identify those eligible to receive Title I services and then select those who were to be served from that pool. The intent of the Title I legislation and regulations was that the students with greatest need be served first. However, the legal provisions for Title I participation by limited-English proficient and handicapped children were different from those applicable to other students. Again, Chapter 1 of ECIA changed these requirements, and Directors of Title I projects were asked to speculate about the consequences.

Student Selection Procedures

Nearly all districts used cutoff scores on achievement tests to select students. However, 60 percent of the districts reported that teachers could decide to give Title I services to students above the cutoff, and a similar percentage reported that teachers could decide that students below the cutoff did not need the services.

Percentage of Eligible Students Served

The percentage of eligible students served in a district was a function of a number of factors including the district's Title I funding level, intensity of services, and the district's concept of eligibility. For example, one district could consider all students scoring below the 40th percentile on a standardized

test as eligible while another could establish a stricter definition of below the 20th percentile. Given the varying concepts of eligibility, fewer than half the districts (44 percent) reported serving all eligible students. Small districts, however, were much more likely to report serving all eligible students than larger districts.

Eligibility of Limited-English-Proficient or Handicapped Students

Practices ranged from including all multiply eligible students in Title I to excluding all of them. In some districts, the level of English proficiency or severity of the handicap determined eligibility for Title I. Generally, limited-English-proficient students were more readily admitted to Title I than were handicapped students. Regular classroom teachers were more likely to favor serving these students in the Title I program than were Title I instructors.

Local Officials' Assessments of Title I Student Selection Procedures

A high proportion of Principals and non-Title I teachers wanted to change at least some aspect of their districts' current student selection procedures. Most of the desired changes (e.g., increased use of teacher judgment, less reliance on test scores) were permitted by Federal law. However, more than one-third of the Principals interviewed wanted to serve higher scoring students rather than only those furthest behind. A majority of Title I Directors and Principals favored their districts' policies for serving multiply eligible students in the Title I program.

Anticipated Effects of Chapter 1, ECIA on Student Selection

Thirty-nine percent of the Title I Directors expected a reduction or dilution of services to the current program participants as a result of ECIA's "utilize part" provision. One-third of the Directors felt that the "permits" provision would result in serving those students with greatest potential rather than those who were furthest behind.

Program Design

Federal regulations allowed considerable flexibility in the design of Title I projects. They did not specify the grade levels to be served, the subjects to be taught, the time periods in which to deliver project services, or the resources to be used. The Title I District Practices Study focused on the reasons given for choosing particular service delivery models, the "intensity" of Title I instruction, and characteristics of the staff employed to provide Title I instructional services.

Reasons for Selecting Service Delivery Models

As reported earlier, over 90 percent of the districts were using a pullout model, while 30 percent were using an inclass design. Ninety percent of the Directors using pullout designs indicated that they did so because thought they it was educationally superior for all or part of their Title I programs. Seventy-three percent said that pullouts made it easier to demonstrate compliance with funds allocation requirements. Fifty-seven percent said that the state Title I office advised the use of the pullout design.

Three-fourths of the Directors using inclass designs responded that they did so because it was educationally superior for all or part of their Title I programs. Forty-two percent said that physical facilities for pullouts were not available, and 28 percent said that the state Title I office had advised the use of this design.

Intensity of Title I Instruction

The average number of students in public Title I classes was 9.8, and the pupil-to-instructor ratio was 4.5 to 1. Public school students spent four hours per week in Title I classes. Data on the nature and intensity of instruction for nonpublic school students are presented later in this synopsis.

Local Policies on Subjects Missed During Title I Instruction

Title I instruction took place during the school day at 98 percent of the schools. Nearly 60 percent of the schools had a policy on the nature of the regular instruction that students could not miss while receiving Title I services. Sixty-two percent of these policies protected regular reading services, while 44 percent protected mathematics.

Characteristics of Title I Staff and Staff Inservice

Title I teachers had 5.5 years of teaching experience, on average. They spent 57 percent of their time during the week working with students. In 27 percent of the districts Title I staff were exempt from noninstructional duties. Nearly 90 percent of Principals were satisfied with the Title I instructional staff. On average, Title I instructors attended nine inservice sessions during a typical school year. Title I Directors

considered these sessions to be valuable for their staff, but 12 percent of the districts provided no inservice training for Title I staff.

Parental Involvement

Under the provisions of the Title I legislation, districts were to establish a Parent Advisory Council for the district and usually one for each participating school or project area. These councils were to advise the district about the planning, implementation, and evaluation of the Title I program. Chapter 1 of ECIA no longer mandated the establishment of these councils, though it still required parental involvement. The District Practices Study gathered data on the functioning of the councils under the 1978 legal framework and the anticipated changes under Chapter 1.

Parent Advisory Councils

Ninety-four percent of the districts had a district-level council, and 89 percent of these districts reported that all Title I schools had school-level councils. Title I Directors reported that eighty-one percent of these councils advised local administrators on program planning, implementation or evaluation. However, for each of these areas, at least 19 percent of the councils had no input at all. Councils in smaller districts had less input than those in larger districts.

Burden of Parental Involvement Requirements

Parental involvement was ranked as the most burdensome of the legislative requirements for Title I programs, even though

the amount of time administrators devoted to this activity averaged less than 10 percent of the time spent on administering Title I. More than half the Directors reported that there were problems obtaining council members and getting them to attend meetings.

Anticipated Effects of Chapter 1, ECIA on Parental Involvement

About one-fourth of the Directors felt that the councils would operate as they had before. Most Title I Directors, however, predicted changes in Parent Advisory Councils under Chapter 1. Almost 20 percent believed that both the district and school advisory councils would be effectively eliminated. The district advisory councils seemed to cause the least problems and seemed to be the most likely to remain intact. However, almost a third of the Directors (32 percent) thought that either the district advisory council or at least some of the school advisory councils would be reduced or eliminated.

Funds Allocation Requirements

The Title I funds allocation provisions contained four interrelated requirements designed to ensure that Title I funds were spent for the purposes intended by Congress. The law generally required that districts maintain their own level of fiscal effort for free public education, that state and local services in Title I attendance areas were comparable to those provided in non-Title I areas, that Title I funds could only be used for costs exceeding the average per-pupil expenditure of

state and local funds, and that Title I funds had to supplement and not supplant the state and local funds to which Title I children were entitled.

The District Practices Study focused on local school district officials' overall assessment of these requirements since other recent studies had more fully examined actual local implementation under these provisions.

Maintenance of Effort

Ninety-four percent of the districts reported that they had no difficulty meeting Title I standards for maintaining state and local effort.

Comparability

Ninety-two percent of the districts reported no difficulty with meeting the Title I standards.

Excess Costs

Ninety-one percent of the districts reported no problems with the excess costs requirements.

Supplement-Not-Supplant

Twenty-eight percent of the Directors reported that their districts had problems implementing some aspects of the supplement-not-supplant requirement. Three percent of the districts indicated that state staff had raised issues concerning supplanting when reviewing their applications. There is some evidence that Directors confuse supplement-not-supplant violations with potential general aid problems.

Anticipated Effects of Chapter 1, ECIA on Funds Allocation Requirements

Over one-third of the Title I Directors could not predict the effect of the changes of the maintenance of effort, comparability, and supplement-not-supplant requirements when they were interviewed in the fall and winter of 1981. Initially, however, a large proportion of these Directors were favorably disposed to the revised maintenance of effort (48 percent) and comparability (58 percent) requirements.

State Influence on District Practices

Title I was administered through an intergovernmental system in which states were to: approve Title I applications from districts, monitor Title I programs, conduct fiscal and compliance audits of local programs, provide technical assistance to districts, and develop state policies and regulations. Previous research had shown that states differed considerably in how they carried out their administrative responsibilities under Title I. The 1978 legislation was intended to standardize some of these practices. It was difficult to conclude that this effect had been realized because districts within the same state had very widely differing opinions about the nature of state regulations compared to Federal regulations.

Monitoring and Compliance Auditing

Nearly 80 percent of the districts reported no increase in the frequency of state monitoring visits since 1978, and 30 percent stated that they had not been audited by state or Federal officials in three years. A few of the districts that were

audited had changed their programs as a result of audit exceptions.

Technical Assistance

Nearly one-third of the districts reported that they received no technical assistance from the state. Those that did were satisfied with this support. Only about one-third of the districts that substantially changed their Title I programs considered the state to have influenced the change. On the other hand, 45 percent of the Title I Directors who reported that they would like to make changes in their projects cited state opposition as a significant barrier.

Participation of Nonpublic School Students in Title I

Congress included several new provisions in the 1978 Title I law to address the possibility that students in nonpublic schools might not have been receiving their fair share of program services. Essentially identical provisions were incorporated under the legislation for Chapter 1 of ECIA. Educationally deprived children who reside in a Title I/Chapter 1 project area and attend a nonpublic school should have the same opportunity to receive federally funded compensatory education services as their public school counterparts, even if the school they attend is outside the project area. Expenditures for public and nonpublic students should be the same within a district, taking into account the number and needs of the students.

Scope of Services to Nonpublic School Students

In 1978, 59 percent of the districts with nonpublic students provided Title I services to some of those students. This

percentage declined to 56 in 1981. At the student level, the participation rate of nonpublic students increased by just less than 6 percent, while the public student participation rate increased by almost 18 percent over the same time span (1978-81). Most districts reported little or no change over the last several years in their procedures for determining whether nonpublic schools had students living in Title I attendance areas.

Nature and Intensity of Title I Services to Nonpublic School Students

Compared to their public school counterparts in the same district, nonpublic school students, on average, had Title I classes which were of a shorter duration, smaller in size, and with a lower pupil-to-instructor ratio. Like their public school counterparts, their Title I instructors had taught, on average, approximately 5 years. Virtually all of the services provided to nonpublic students were provided in pullout classes. More than 20 percent of the districts that served nonpublic students in the Title I project did so at a location other than the nonpublic school those students attended.

Local Title I Evaluation and Technical Assistance

By 1978 districts were required to follow specified evaluation procedures, including the use of one of three well-defined evaluation models, and to use the results of these evaluations in local program planning. Federally supported Technical Assistance Centers [TACs] were to provide help in implementing these models, and the states could provide similar assistance. As reported above, Directors of local projects viewed evaluation as one of

the necessary but burdensome requirements of the program. The District Practices Study also collected data on the usefulness of the results and the quality of the assistance given by state and Federal agencies.

Utility of Evaluation Results

In districts that had made changes in either the grade levels served or the subject matter to be emphasized, about 25 percent reported that formal program evaluations had influenced the decision to make changes. However, needs surveys, staff recommendations, and changes in funding levels were cited more frequently as reasons for making changes. Fifty-three percent of the Directors indicated that evaluation results were very important in making changes in the Title I curriculum, while only 16 percent gave evaluation the same importance in making staffing changes.

Technical Assistance

Nearly 45 percent of the districts indicated that the state Title I office had helped to develop or improve their evaluation practices. Twenty-six percent of the districts reported that one of the federally supported TACs had been helpful in this regard. Nonetheless, there was considerable variation of opinion within states regarding the helpfulness of the state offices and the TACs.

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CHAPTER 2

PROFILE OF TITLE I

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

To provide a context for the findings about the management practices of districts implementing Title I projects, this chapter describes the nature and scope of the services provided to Title I students, the allocation of funds across budget categories, and the time allocation of local Title I administrators. The specific questions that directed the inquiry and highlights of the findings are presented below.

- What is the nature of the districts that received Title I funding?

- Approximately 90 percent of the nation's school districts received Title I funding during the 1981-82 school year.
- Seventy-three percent of the Title I districts had enrollments below 2,500 students; 22 percent had enrollments between 2,500 and 9,999. The rest (5 percent) had 10,000 or more students enrolled.
- Sixty-nine percent of the districts were in non-metropolitan areas; 25 percent were in urban fringes, and 6 percent were in central cities.
- In 17 percent of the districts, fewer than five percent of the students came from families at or below the poverty line. In another 17 percent of the districts, 25 percent or more of the students came from such families.

- How did districts allocate their Title I budgets?

- Nearly 80 percent of the funds were expended on instructional services. The next largest budget item was "fixed charges," such as personnel benefits, accounting for 7 percent of the budget. Administration costs consumed another 5 percent of the budget.

• What were the grade levels most commonly served, and what services were provided for Title I students?

- Seventy-two percent of the students served were in grades 1 through 6. At least 80 percent of the districts served students in each of grades 2 through 5. Fewer than 18 percent of the districts served students in grades 10 through 12.
- Services were almost universally provided in reading. Almost two-thirds of the districts reported that mathematics was part of the Title I program. Language arts was included in the Title I program in one-third of the districts.
- Ninety-two percent of the districts employed a pull-out design for program services, while 30 percent used an inclass design. Most of the districts utilizing the inclass design were large (enrollment greater than 10,000 students).

• How do Title I Directors allocate their time?

- Eighty-three percent of the Directors have no other paid administrative support. They are solely responsible for the administration of the project.
- Of the time they spent on Title I, the Directors reported that 25 percent was spent on preparing applications and reports and an equal percent of time was spent on managing or supervising the instructional program. Developing and managing the Title I budget, evaluation, and organizing and meeting with parents each took 10 to 13 percent of the Director's time.

• Which of the Title I legal requirements did local Directors perceive to be necessary to achieve the program's goals, and which were perceived to create the most burden?

- Directors of Title I projects found the legislative requirements for comparability (documenting that each Title I school had a level of service comparable to the average level in non-Title I schools) and parental involvement (including the parent advisory councils) to be the most burdensome and the least necessary to meet program objectives.
- Among those requirements considered necessary, evaluation and student selection were considered to be

burdensome, while the supplement-not-supplant, school selection, and providing for adequate size, scope and quality of the project were not regarded as burdensome.

INTRODUCTION

This chapter presents a profile of the districts receiving Title I funds during the 1981-82 school year. It also describes how the program was administered at the local level, including data on use of funds for instruction, administration, and other budget categories. Data are also presented which describe the range and type of services that were provided to Title I students.

Findings presented in this chapter are based on mail questionnaire data collected in the fall of 1981 from Directors of Title I programs in 1,793 school districts. A response rate of 87 percent was achieved, and the resulting data were weighted so that all results would reflect national estimates of what was taking place in the Title I program. Details on the sample selection and weighting are presented in the Appendix to this resource book. The reader should assume that all results presented in the remainder of this chapter reflect a nationally representative picture of Title I.

PROJECT DEMOGRAPHICS

We estimated that approximately 90 percent (12,797 districts) of the nation's school districts received some type of Title I funding during the 1981-82 school year.

Title I projects can be characterized by a series of demographic variables that provide a context for understanding the local operation of the program. Three demographic variables were

used to select our sample: district size, district poverty level, and urbanicity.

The size of a Title I district was measured in terms of its total pupil enrollment in 1981. Based on the total enrollment, four size groupings were established. These size groupings are described in Table 2-1. Many subsequent analyses will relate these size categories to other characteristics of Title I projects.

TABLE 2-1

PERCENT OF TITLE I DISTRICTS BY DISTRICT SIZE

<u>Enrollment Grouping</u>	<u>District Description</u>	<u>Percent of Title I Districts</u>
0-2,499 Students	Small	73
2,500-9,999	Medium	22
10,000-50,000	Large	4
>50,000+	Among 60 largest	1

As is readily apparent in Table 2-1, the greatest percentage of Title I districts (73 percent) can be characterized as small districts enrolling less than 2,500 students. Large districts, defined as enrolling more than 10,000 students, account for less than 5 percent of the nation's Title I districts.

The urbanicity of the Title I projects nationally is described in Table 2-2. The majority of the Title I projects (69 percent) are located in nonmetropolitan or rural districts. Only 6 percent of Title I projects are located in central city districts.

TABLE 2-2

PERCENT OF TITLE I DISTRICTS BY URBANICITY

<u>Project Location</u>	<u>Percent of Title I Districts</u>
Central City	6
Urban Fringe	25
Nonmetropolitan	69

A district's poverty level can be described as a function of the percentage of students who come from families at or below the poverty line. These percentages were clustered into four groupings for this study based on the Orshansky poverty index, as shown in Table 2-3.

TABLE 2-3

PERCENT OF TITLE I DISTRICTS BY POVERTY LEVEL

<u>Percent of Students From Families At or Below Poverty Line</u>	<u>Description</u>	<u>Percent of Title I Districts</u>
.1 - 4.9	Low Incidence	17
5 - 11.9	Moderate Incidence	35
12 - 24.9	High Incidence	31
25 and over	Severe Incidence	17

Another demographic variable for portraying the Title I national program is the geographic location of Title I projects.

Projects were grouped into four regions used by the U.S. Department of Commerce, Bureau of the Census (See Appendix A). The regional distributions for these projects can be found in Table 2-4.

TABLE 2-4

PERCENT OF TITLE I DISTRICTS BY REGIONAL LOCATION

<u>Region</u>	<u>Percent of Title I Districts</u>
Northeast	22
North Central	39
South	23
West	17

According to these four basic demographic variables, the typical (modal) Title I program was located in a nonmetropolitan or rural North Central district with fewer than 2,500 students and with approximately 8 percent students from low-income families at or below the poverty line.

PROJECT EXPENDITURES

One important decision that school administrators must make is how to allocate their funds between instructional and non-instructional activities. Table 2-5 shows that in both 1976 and 1981, district administrators reported allocating a preponderance of Title I funds to instruction, 74 percent in 1976 and 79

TABLE 2-5

DISTRICT ALLOCATION OF TITLE I FUNDS
IN 1976 AND 1981, BY EXPENDITURE ITEM

Average Percent of Total Budget

<u>Expenditure Items</u>	<u>NIE Survey - 1976*</u>	<u>Advanced Technology Survey - 1981</u>
Instruction	74	79
Auxiliary services (e.g. parent training, health services)	5	3
Administration (cost of salaries and equipment for District Coordinator, other staff, and evaluation)	4	5
Operation and maintenance	2	1
Fixed charges (e.g., personnel benefits)	11	7
Capital outlays	1	.5
Others (e.g., debt service, school security, miscellaneous)	3	- **
	<hr/> 100	<hr/> 95.5

*Sources: National Institute of Education, Compensatory Education Services (Washington D.C.), p. 19; Memorandum from Paul Hill, Chief of Compensatory Education Division to Mr. John Jennings, Majority Counsel, House Education and Labor Committee, August 11, 1977.

**This category was not included in the Advanced Technology survey and may account for some of the expenditures not reported in other categories.

percent in 1981.* Much smaller amounts were allocated to auxiliary services (such as Title I nurses and counselors), administration, operations and maintenance, fixed charges (which include fringe benefits to teachers and administrators), and capital outlays (equipment purchases).** Moreover, as Table 2-5 illustrates, these allocations vary little from the findings of the National Institute of Education study, which examined the Title I program in the 1975-76 school year. The only discrepancies--in instruction and fixed charges--may be due to some respondents' including fringe benefits to teachers in the instruction category.

Project expenditures can also be expressed as average per pupil expenditures for each district. When per pupil expenditures are broken down by district size, urbanicity, poverty level, and region, some interesting patterns emerge as shown.

*These are self-reported budget figures, which should be interpreted cautiously. For example, we know from case study data that some Title I Directors included in their instructional budget Title I resource teachers who provide services to classroom teachers but never serve children directly. One could argue that these salaries should be included in the administration category.

**The mail questionnaire did not give detailed definitions of these budget categories. Thus, some of the conclusions about budget allocations must be tentative. One difficulty with these aggregate budget data is that the subcategories do not sum exactly to total budget allocations. This may be explained in part by the failure to include an indirect costs category in the mail questionnaire. When Title I Directors added this category--which can include costs allocated to locally provided accounting and payroll services, computer time, space rental, and utilities--indirect costs typically ranged from 2 to 5 percent. If assigning these expenses to indirect costs is widespread, this would account for the money missing from the subcategories.

in Table 2-6. Per pupil expenditures tended to increase with the size of the district. The largest districts in the country, for example, spent \$68 more per pupil than small districts, on average. The greater the proportion of students below the poverty level, the more expensive it was to provide Title I services. Per pupil expenditures were also higher in the North Central districts:

TABLE 2-6

PER PUPIL EXPENDITURES BY DISTRICT SIZE, URBANICITY,
POVERTY LEVEL, AND GEOGRAPHIC REGION

<u>District Size</u>	<u>Per Pupil Title I Expenditures</u>
Small	\$558
Medium	\$551
Large	\$615
Certainty (among 60 largest)	\$626
 <u>Urbanicity</u>	
Central City	\$628
Urban Fringe	\$514
Nonmetropolitan	\$578
 <u>Poverty Level</u>	
Low Incidence	\$528
Moderate Incidence	\$555
High Incidence	\$590
Severe Incidence	\$604
 <u>Region</u>	
Northeast	\$526
North Central	\$630
South	\$551
West	\$530

LOCAL ADMINISTRATION

Since the focus of the study was on local district practices, emphasis was placed on studying the activities of the Title I Director. The typical Title I Director has worked in his or her school district an average of 11.6 years and has been a Title I Director for almost 6 years. Approximately 83 percent have no other paid administrative support. Of the remaining 17 percent who had additional paid administrative support, 58 percent had the help of project or curriculum specialists, 38 percent had a parent involvement representative, 36 percent had an evaluation specialist, 36 percent had a fiscal specialist, and 20 percent mentioned additional support in clerical and other administrative areas.

Administrative Activities

Title I Directors who received the mail questionnaire were asked to indicate what percentage of their time was spent administering the program. Table 2-7 shows, as one would expect, that Directors in larger districts spent more time in their administration of Title I than those in smaller districts.

The Directors were asked how they apportioned their time administering Title I across eight tasks. Table 2-8 presents a summary of these administrative activities for districts arranged by four enrollment size categories. For the typical (i.e., modal) Title I school district, over 50 percent of the administrative activity involved preparing Title I applications and

TABLE 2-7

PERCENT OF TIME TITLE I DIRECTORS SPEND ADMINISTERING
TITLE I, BY DISTRICT ENROLLMENT SIZE*

<u>Percent of Time Admin- istering Title I</u>	<u>District Enrollment</u>		
	<u>Percent Small</u>	<u>Percent Medium</u>	<u>Percent Large</u>
0-25	73	43	15
26-75	18	35	35
76-100	6	23	50
	<u>(760)**</u>	<u>(618)</u>	<u>(322)</u>

*Column totals may not total to 100 percent due to missing data.

**Number in parentheses below line in this and subsequent tables is the number of respondents to this item.

TABLE 2-8

AVERAGE PERCENTAGE OF TIME SPENT ADMINISTERING
ASPECTS OF TITLE I, BY SIZE OF DISTRICT

<u>Activity</u>	<u>Small</u>	<u>Medium</u>	<u>Large</u>	<u>Certainty</u>	<u>Typical District</u>
Preparing Title I applications/reports	27	22	20	14	25
Developing/managing Title I budget	13	14	15	18	13
Managing/supervising instructional program	24	29	31	40	26
Hiring staff/arranging training	6	6	6	5	6
Organizing and meeting with parents	10	10	9	9	10
Dealing with Federal/state officials	7	6	8	8	7
Evaluation	13	11	11	7	12
Other	1	1	1	1	1
	(742)	(602)	(315)	(30)	

reports (25 percent), and managing and supervising the Title I instructional program (26 percent). Managing the budget consumed 13 percent of the time, evaluation took up 12 percent, and parent involvement required 10 percent. The remaining 14 percent of time was spent on staff hiring and training, dealing with Federal and state officials, and other miscellaneous activities.

An inspection of Table 2-8 indicates that administrative activities for Title I Directors can vary substantially based on a district's size. For example, Directors in small districts spent 27 percent of their time preparing Title I applications and reports compared with only 14 percent of Directors' time in 30 of the nation's 60 largest districts. These differences might have been related to large districts' having more administrative personnel to help with the report preparation while smaller district Directors could rely only on themselves to complete the required reporting. Managing the budget was more time-consuming in larger districts. Budget activities accounted for 18 percent of a Director's time in the larger districts compared with 13 percent in the smaller districts. The activity with the greatest differences in administrator's time involved managing the instructional program. On the average, small district Directors spent 24 percent of their time managing the instructional program compared to 40 percent of the time spent by the Directors of the largest districts. Not surprisingly then, in the largest districts, communication about the instructional programs was more involved and assumed a greater portion of the Title I Director's time.

Necessity and Burden in Title I Administration

In order to understand the perceptions of Title I Directors regarding burden of the legal requirements of Title I, 10 requirements were identified which were most salient for these Directors. They were:

- Ranking and selecting project areas (i.e., procedures for selection of project areas)
- Ranking and selecting students (i.e., procedures for determining which children will be served with Title I funds)
- Parental involvement, including advisory councils (i.e., the nature and extent of parental involvement in the planning, design, and evaluation of the Title I project)
- Complaint resolution procedures (i.e., procedures for processing, responding to, and reporting problems raised by parents or other individuals)
- Evaluation procedures (i.e., use of evaluation models for assessing gains made by students in the Title I program)
- Supplement-not-supplant provisions (i.e., data to ensure that Title I funds are added to and not used to replace state and local funds)
- Maintenance of effort provisions (i.e., an assurance that funds from state and local sources did not decrease)
- Comparability procedures (i.e., documentation that the level of services in every Title I school must be comparable, or roughly equal, to the average level in non-Title I schools)
- Excess costs determinations (i.e., documentation that Title I services are supplemental using various program design approaches, e.g., limited pullout, pullout, inclass, and replacement)
- Adequate size, scope, and quality (i.e., an assurance that Title I services are of sufficient size, scope, and quality to give reasonable promise of success)

Title I Directors ranked these elements of the legal framework on a continuum of most burdensome to least burdensome. They also ranked all of these elements on a continuum ranging from most necessary to least necessary. Rankings range from 10 to 1, with 1 representing the most necessary and most burdensome activities and 10 representing the least necessary and least burdensome activities.*

An examination of the average rankings for the necessity dimensions shows that mean ranks range from 1.7 to 7.7.** Ranked from most necessary to least necessary, the items and their associated average rankings were:

- Rankings and student selection (1.7)
- Evaluation procedures (3.5)
- Ranking and selecting project areas (4.2)
- Adequate size, scope, and quality provisions (4.8)
- Supplement-not-supplant provisions (5.4)
- Parental involvement (5.6)
- Maintenance of effort provisions (6.5)
- Comparability procedures (7.3)
- ~~Excess costs determinations (7.5)~~
- Complaint resolution procedures (7.7)

*To validate this ranking approach, similar questions were asked during site visits to 100 districts conducted as part of this study. Results from questions in the Title I Director interviews indicate that when the Title I Director is presented with similar questions in an open-ended format, similar rankings of burden compared to those of the mail questionnaire are obtained.

**A comparison of mean rankings to median rankings indicates no differences greater than .2, so only mean rankings are discussed.

The average rankings on the burden dimension ranged from 3.8 to 6.5 and included, in order, from most burdensome to least burdensome:

- Parental involvement (3.8)
- Evaluation procedures (4.2)
- Comparability procedures (4.9)
- Ranking and selecting students (5.1)
- Supplement-not-supplant provisions (5.5)
- Maintenance of effort provisions (5.5)
- Ranking and selecting project areas (6.0)
- Excess costs determinations (6.0)
- Adequate size, scope, and quality provisions (6.3)
- Complaint resolution procedures (6.5)

On the burden dimension, the rankings more closely clustered around the mean and spanned a narrower range. Such a distribution suggests generally less agreement about what was burdensome than what was necessary. Thus, Title I Directors agreed more on the necessary elements of the program, while burdensome rankings were affected by other factors such as district size.

To understand more fully how the Directors perceived these requirements, Figure 2-1 plots the mean rankings of the 10 items on a two-dimensional graph. Each quadrant of the plot corresponds to one of four types of perceptions:

- Most Necessary and Most Burdensome Items
 - Evaluation
 - Student selection

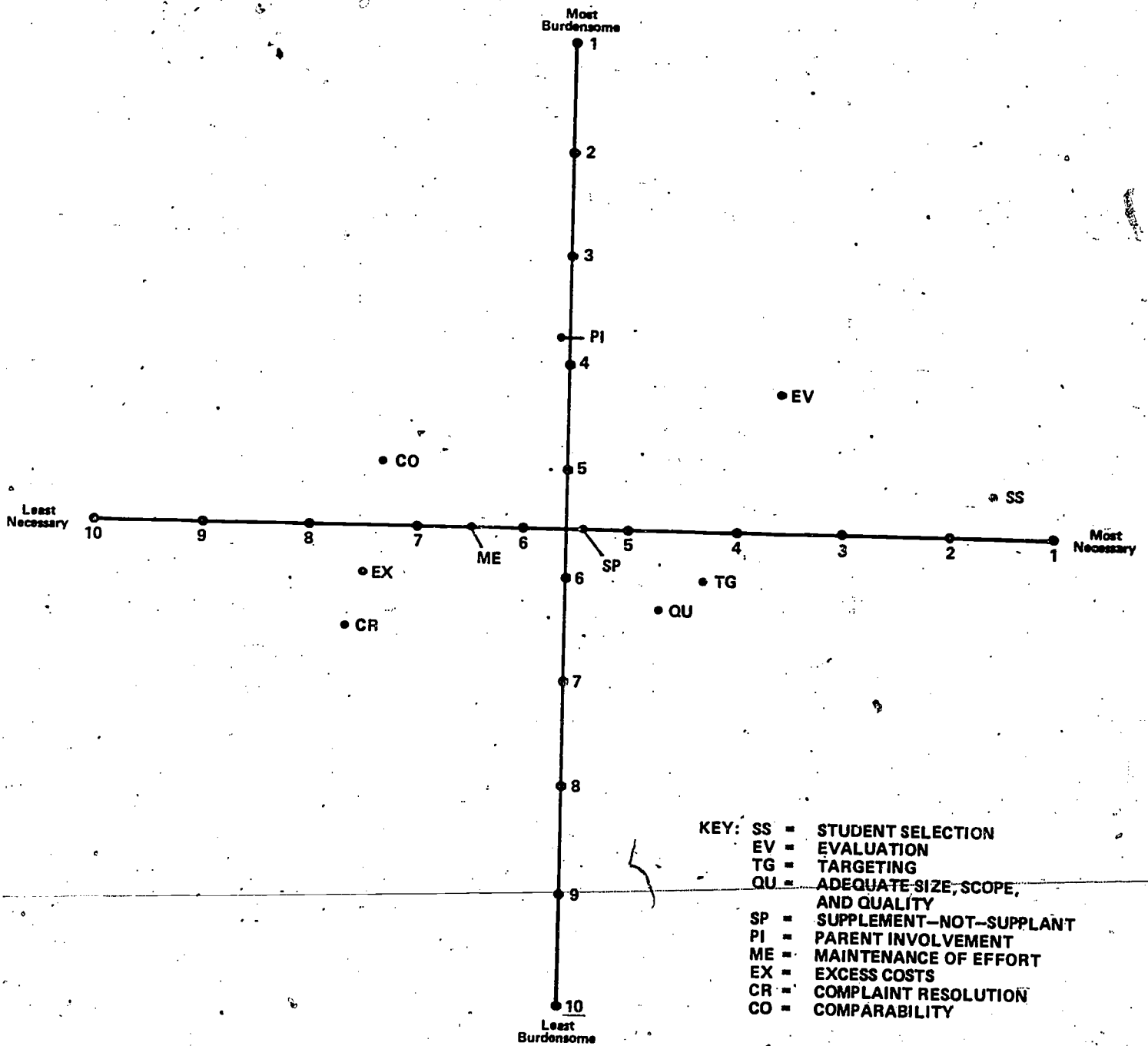


FIGURE 2-1

MEAN RANKINGS ON BURDEN AND NECESSITY FOR
 TITLE I DISTRICTS

- Least Necessary and Least Burdensome Items
 - Complaint resolution
 - Determinations of excess costs
 - Maintenance of effort
- Most Necessary and Least Burdensome Activities
 - Supplement-not-supplant
 - Adequate size, scope, and quality
 - Targeting
- Most Burdensome and Least Necessary Items
 - Comparability
 - Parental involvement .

It is noteworthy that those provisions of the 1978 Title I legislation that were deemed to have been the most burdensome and least necessary by local directors (i.e., comparability and parental involvement) were substantially modified by the Chapter 1, ECIA legislation.

STUDENTS SERVED BY TITLE I

Table 2-9 presents a breakdown by grade of the projected number of public school students served by Title I in the 1981-82 school year. According to these projections, 4,279,111 public school students were served by Title I during the 1981-82 school year. Including all neglected or delinquent [N or D] students, the projected total was 4,575,800 students. We also estimated that Title I served approximately 198,650 nonpublic students during the same school year. Including all public schools, N or D, and nonpublic school students, we estimate that a total of

TABLE 2-9

PROJECTED PUBLIC AND NONPUBLIC PARTICIPATION
IN TITLE I DURING 1981-82 SCHOOL YEAR

<u>Projected Participation Data</u>	<u>Number of Students Served by Title I</u>	<u>Percentage of Total</u>
Public participation based on grade level estimates	4,279,111	
Public participation based on total esti- mates, including N or D	4,575,800	96.1
Nonpublic participation based on total estimates	198,650	3.9
TOTAL	4,774,450	100

4,774,450 students were served by Title I (see Table 2-9). This represents approximately a 12 percent decline in service using ED's enrollment figures for 1979-80 as a base.

A majority of students served were in the elementary grades. Approximately 72 percent of the students served were in grades 1 through 6. Only 10 percent of the participants were in grades 9 through 12, and 6 percent were in prekindergarten and kindergarten programs. Thus, Title I programs placed the greatest emphasis on serving students in grades 2 through 5. At least 80 percent of all districts serve some students in these grades (see Table 2-10).

TYPES OF SERVICES PROVIDED

Reading continued to be emphasized in Title I programs. Next in importance was mathematics. Almost two-thirds of the districts reported that mathematics was part of their Title I programs. Other language arts was included in the Title I program in approximately one-third of the districts. English for students of limited-English background was part of the Title I program in 11 percent of the districts, and a small percentage of districts offered other subject areas such as special education for the handicapped (4 percent) and vocational education (2 percent).

Changes in Title I subject areas since 1978 were reported by 30 percent of the mail questionnaire districts. More districts have added or increased Title I services in the areas of reading, mathematics, other language arts, and English for students of

TABLE 2-10

PROJECTED NUMBER OF PUBLIC SCHOOL TITLE I PARTICIPANTS
SERVED BY GRADE LEVEL DURING 1981-82 SCHOOL YEAR

<u>Grade</u>	<u>Percent of Districts Serving the Grade</u>	<u>Projected Number of Title I Students Served</u>	<u>Percent of Total Number Served</u>
Pre-K	4	45,228	1
Kindergarten	22	230,778	6
1	73	463,832	11
2	85	642,327	15
3	85	526,237	12
4	84	515,085	12
5	80	494,872	12
6	71	420,928	10
7	50	295,383	7
8	47	248,575	6
9	23	167,126	4
10	18	111,149	3
11	14	70,203	2
12	12	47,388	1
TOTAL		4,279,111	100

limited-English background than have dropped or decreased services in these areas. The reverse is true for special education and vocational programs. The most frequent reasons reported by districts for these changes of emphasis in subject areas were:

- Changes in Title I funding level (44 percent of those districts which have made changes)
- Data from formal needs surveys (41 percent)
- Teachers' or Principals' recommendations (38 percent)
- Results of formal Title I program evaluations (27 percent)
- Parents' recommendations (26 percent)
- New state mandates or emphasis (24 percent)

Most districts continued to choose the pullout model rather than the inclass model. Ninety-two percent of the districts surveyed by mail employed a pullout design either exclusively or in combination with the inclass design. In contrast, only 30 percent of the mail survey districts reported using an inclass approach for part or all of their program.

District size (as measured by the number of students enrolled) and budget allocation played no major role regarding the likelihood of a district to use the pullout design. However, the use of an inclass design was significantly correlated with district size. For the 30 percent of the mail questionnaire districts that used the inclass design, very large districts and large districts were far more likely to employ the inclass model than small districts and medium districts.

District administrators indicated, for the most part, that there had not been much change regarding the use of the pullout

design in their Title I program. Ten percent of the districts indicated an increase in the use of pullout, and ten percent indicated a decrease.

SUMMARY

Title I services reached 4.8 million students in more than 90 percent of the nation's school districts. Services were almost universally provided in reading. At least eighty percent of the districts provided services in one or more of the grades from two through five. The number of students served had declined by almost 12 percent from two years earlier. The typical project employed a pullout design, although some (especially larger) districts were trying inclass designs.

Administrators found evaluation and student selection requirements to be burdensome but necessary, while they believed comparability and parental involvement to be at least as burdensome and far less necessary.

CHAPTER 3

SCHOOL SELECTION AND TARGETING

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

- What information sources did districts use in selecting schools?
 - By far the most common information source for school selection decisions was free or reduced price lunch counts.
- Did districts tend to select all eligible schools or did they select schools from a pool of those eligible?
 - Nearly three-fourths of the school districts provided Title I funds to all eligible schools.
- How extensively were districts using options for school selection allowed by the Title I legal framework?*
 - The most frequently used school selection option was ranking by grade span, though other options were also used by substantial percentages of the nation's school districts; many districts, however, were unaware of options available to them.
- What were districts' objectives in choosing information sources and school selection options?
 - Most districts, in choosing information sources and school selection options, sought to maximize the number of schools that would participate in the program, and a substantial number of districts experimented with different sources or options to

*These options included (1) selection of schools serving only certain grade levels; (2) eligibility of schools according to enrollment data, where attendance area demographic information made the area ineligible; (3) eligibility of any school or attendance area having a poverty concentration equal to or exceeding 25 percent; (4) selection of areas or schools according to incidence of educationally deprived rather than low-income children; (5) continued eligibility, for a limited time, of schools previously served (a "grandfather" clause); and (6) the option not to serve schools receiving services similar to Title I under a state or local compensatory education program. These options are discussed more fully in the next section of this report.

test the results before finally choosing a district policy.

● What criteria did districts use in allocating Title I funds to schools?

- Three-fourths of the school districts allocated Title I funds to schools according to the number of children selected to participate in the program. There is substantial evidence, however, that informal judgment, not just counts of participants, played a significant role in funds allocation.

● What were district officials' assessments or opinions of aspects of the Title I school selection provisions?

- Most districts would prefer to select Title I schools according to achievement data, but this view was far more prevalent among small districts than large districts.

● What did these officials believe would be the effects of ECIA school selection requirements?

- Just over half the school districts believed that they would have the same flexibility in selecting schools under ECIA, even with the possible elimination of Title I school selection options; a similar percentage of Title I Directors, however, believed that ECIA's school and student selection provisions may increase the difficulty of implementation, change the program's intent, result in transformation of the program to general aid to schools, or lead to wasted funds.

SUMMARY OF LEGAL REQUIREMENTS

Under Title I, a school district generally was required to use its Title I funds only in "school attendance areas having high concentrations of children from low-income families" (§122(a)(1)).* Furthermore, districts were usually required to rank attendance areas by poverty concentration, using the best available poverty measure,** and serve them in order from highest to lowest.***

School districts, however, could rank areas by grade span, an option that provided additional choices in determining eligibility of school attendance areas. A district desiring to limit its Title I program to grades K-6, for example, could choose to rank only the attendance areas with schools serving those grades. This district would not have to consider serving secondary school

*"High" was interpreted to mean average or above (see 46 F.R. 5136 et seq., §201.51, January 19, 1981). However, any area having a 25 percent or greater concentration of children from low-income families could be considered eligible if the total level of Title I and state compensatory education expenditures in Title I areas served the year before remained in those areas at that level or was increased (§122(a)(1)). Note: Statute citations can be distinguished from regulation citations by the latter's use of decimal points in the numbers.

**§201.51(b).

***"A local educational agency could carry on a program or project assisted under this title in an eligible school attendance area only if it also carried on such program or project in all other eligible school attendance areas which are ranked higher" (§122(a)(1)). There were exceptions to this requirement, though, which are discussed in the following paragraphs.

areas, even if they had poverty rankings higher than all of the elementary school areas. In addition to this option, the poverty ranking requirement had six exceptions, designed "to give districts more flexibility without watering down the targeting features intended to give the program a focus when funds are limited" (H.R. Rep. 1137, pp. 20-21).

First, in districts where there was "no wide variance" in poverty concentration among attendance areas, all areas could be served, including those below average. Second, a school attendance area having a relatively high concentration of children from low-income families could be passed over, or "skipped," in favor of an attendance area having a "substantially greater" concentration of children who were educationally deprived.*

Third, a school attendance area initially ranked higher could be skipped if that area was served by a state compensatory education program providing "services of the same nature and scope as would otherwise be provided" by Title I (§122(e)),

Under a fourth exception, an attendance area receiving Title I funding in one year could remain eligible the next two succeeding fiscal years, even if it ceased to have a high concentration of children from low-income families (§122(c)). The

fifth exception provided that a school not located in an eligible area, but nonetheless enrolling a high concentration of children

*A district, however, could not use this exception to serve a total number of areas greater than the total number of areas that would have been eligible if the only factor considered as concentration of children from low-income families (§122(a)(2)(A)).

from low income families*, was treated in the same manner as an eligible attendance area (§122(b)). Finally, the sixth exception allowed attendance areas having a 25 percent or greater concentration of children from low-income families to be served if certain conditions were met (§122(a)(1)).

Selecting attendance areas for Title I services involved not only ranking areas and using options and exceptions but also deciding whether to concentrate the program on a few eligible areas (§124(d)(e)). This decision affected the selection of students and was often difficult to make. A decision not to serve one or more eligible schools, for example, meant low-achieving children attending them received no service, while perhaps some higher-achieving students in target schools did benefit. On the other hand, a district that chose to serve every eligible school may have found its use of Title I funds limited to providing a few services to the lowest-achieving children, rather than more comprehensive services to a broader spectrum of educationally deprived children in the highest ranking schools.

Under Chapter 1, ECIA, the provisions governing school selection require LEA grant applications to assure that proposed projects will be (1) "conducted in attendance areas . . . having the highest concentrations of low-income children"; (2) "located

*This condition might have prevailed in an attendance area where large numbers of children from high-income families attended private school.

in all attendance areas of an agency which has a uniformly high concentration of such children"; or (3) "designed to utilize part of the available funds for services which promise to provide significant help for all such children served by such agency" (§556(b)(1) of ECIA).

The proposed ECIA regulations, 47 F.R. 32873 (July 29, 1982), do not further explain "highest concentrations of low-income children"; however, a draft nonregulatory guidance document issued by the Department of Education on April 22, 1982* states that this provision does not "require an LEA to serve attendance areas in rank order of their concentration of children from low-income families" (p. 8).

The proposed regulations do not explain the meaning of "uniformly high concentration," but the draft guidance document states that this clause is "similar to the 'no-wide variance' provision in . . . the Title I regulations." The document suggests that poverty concentrations among attendance areas could be deemed "uniformly high."

if the variation between (a) the percentage of children from low-income families in the attendance area with the highest concentration of such children and (b) the percentage of children from low-income families in the attendance area with the lowest concentration

*U.S. Department of Education, Nonregulatory Guidance to Assist State Educational Agencies in Administering Federal Financial Assistance to Local Educational Agencies for Projects Designed to Meet the Special Educational Needs of Educationally Deprived Children under Chapter 1 of the Education Consolidation and Improvement Act of 1981. (April 22, 1982, Draft.)

of such children is not more than the greater of 10 percent or one-third of the percentage of children from low-income families in the LEA as a whole (p. 7).

Regarding the ECIA option to use "part of" Chapter 1 funds for all such children, the proposed regulations state in §200.49 that "such children" means "all educationally deprived low-income children served by the LEA." The draft guidance document states that this clause "provides a new option that was not available under Title I":

The Secretary interprets this subsection to permit an LEA to use part of its Chapter 1 funds for services that promise to provide significant help to all low-income children served by the LEA, regardless of whether those children are in attendance areas that qualify under [the "highest concentrations" or "uniformly high concentration" clauses]. Thus, rather than establishing a new procedure for the selection of attendance areas, [the "all such children" clause] actually creates an exception to the requirement that services be provided in eligible attendance areas. (pp. 6-7)

The draft guidance document, however, suggests that services for children participating under this new option "must consist of services that promise to provide significant help in meeting the[ir] special educational needs" (p. 9).

The Chapter 1 statute omits the Title I school selection options (1) to skip a higher ranked attendance area if a lower ranked area has a "substantially greater" concentration of educationally deprived children (§122(a)(2)(A)); (2) to skip an area served by a state or locally funded compensatory program providing services of the "same nature and scope" (§122(e));

(3) to serve a formerly eligible school (§122(c)); (4) to serve a school by using the enrollment exception (§122(b)); and (5) to serve an attendance area with 25 percent of greater concentration of children from low-income families if certain conditions were met (§122(a)(1)). Another ECIA provision may deem these omissions significant:

The provisions of Title I of the Elementary and Secondary Education Act of 1965 which are not specifically made applicable by this chapter shall not be applicable to programs authorized under this chapter. (§554(c))

The regulations do not address the continuing vitality of these Title I options, but the draft guidance document suggests that the last three remain available under Chapter 1.*

Regarding the "formerly eligible" option, the document acknowledges that:

[u]nlike Title I, the Chapter 1 statute does not include a provision that permits an LEA to continue to consider an area to be eligible even if it does not currently qualify as an eligible attendance area. (p. 8)

The document continues, however, implying that an attendance area determined eligible on submission of the district's application may be deemed eligible "for the entire period covered by the LEA's application." Under §556(a) this period is three years.

*Regarding the first option, both the ED comments on the proposed rules and the draft guidance document suggest that "LEAs may consider data on educational deprivation when selecting project areas from eligible attendance areas," but they do not state that data on educational deprivation may be used to determine the eligibility of schools for Chapter 1 services. 47 F.R., p. 32873 (emphasis added).

LEA's application." Under §556(a) this period is three years.

Regarding the Title I option to use enrollment data for schools not located in eligible attendance areas, the draft guidance document clearly states that this option remains available (p. 8). Also, the document states that the "25 percent rule" is one permissible method "for identifying attendance areas . . . having the highest concentration of low-income children" (p. 7). Finally, the document states that grade-span grouping, previously allowed by Title I regulations, though not mentioned in the Title I statute, is still an available option under Chapter 1 (p. 7).

REPORT OF SUBSTANTIVE FINDINGS ACROSS INSTRUMENTS

Tables 3-1 and 3-2 concern the data sources districts used to select Title schools or attendance areas and Title I Directors' reasons for choosing these data. Table 4-1 shows that the most common data source used was free or reduced price lunch counts. As Table 3-2 indicates, the availability and accuracy of the data were the most frequently cited reasons for their use by Title I Directors who were interviewed.

Data from District Practices Study mail questionnaires revealed that 48 percent of the districts used grade-span grouping. Table 3-3 indicates that other school selection options were used by substantial numbers of districts.* However, many

*One exception, though, was the option to skip schools that received state or local compensatory education services similar to Title I. This option was not available to 77 percent of the school districts.

TABLE 3-1

DATA SOURCES USED TO SELECT TITLE I SCHOOLS
OR ATTENDANCE AREAS IN SCHOOL YEAR 1981-82

	<u>Percent*</u>
Free or reduced price lunch counts	77
AFDC enrollment	36
Census data, on family income	19
Free breakfast counts	8
Number neglected and delinquent children**	8
Number non-English speaking families**	3
Employment statistics	2
Number children from migrant families	2
Orshansky Index	2
Other sources	8
	(288)***

*Percentages in this column do not total to 100 percent since districts sometimes used more than one data source in selecting Title I school attendance areas.

**While these are not data sources recognized by the U.S. Department of Education for the selection of Title I attendance areas, they were indicated as sources used by some districts for such selection purposes.

***Number in parentheses below line in this and all subsequent tables is the number of respondents to this item.

TABLE 3-2

TITLE I DIRECTORS REASONS FOR USING DATA SOURCES IN
SELECTING SCHOOLS OR ATTENDANCE AREAS FOR 1981-82

	<u>Percent*</u>
Availability of source(s)	49
Accuracy of source(s)	29
Mandated or recommended by state	13
Number other source(s) considered	13
Maximizes number of schools or students eligible	11
Not applicable--only one school in district	7
No idea why	6
Other--e.g., other sources invade privacy; used by county (all less than 5%)	22

	(100)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 3-3

OPTIONS USED TO SELECT ATTENDANCE AREAS OR SCHOOLS

<u>OPTION</u>	<u>N</u>	<u>Percent Used Option</u>	<u>Percent Unaware of Option</u>	<u>Percent Saying Option Considered But Not Used</u>	<u>Percent Saying Option Not Appli- cable to District</u>
Formerly eligible	267	20	3	5	72*
"No wide variance"-- all selected	267	27	4	8	61
25% rule	247	15	20	11	54**
Skipped one or more eligible areas receiving state or local compensatory services	268	9	7	7	77
Used enroll- ment data	244	46	26	27	0
Ranking and selection by low achievement	249	20	38	41	0

*All previously served areas/schools still eligible.

**Average poverty level in district below 25%.

districts are unaware of the 25 percent rule, or the options to use enrollment statistics or ranking by achievement data.

Response to the mail questionnaire showed that 30 percent of the districts experimented with different methods of school selection before making their final choices. Table 3-4 indicates school districts' objectives in choosing data sources and selection procedures. Most sought to maximize the number of schools or students served while only a few districts defined their objective as concentration of services on a few schools or students. The mail survey data also showed that 74 percent of all districts served every eligible attendance area.

Table 3-5 shows the criteria used by districts to distribute Title I funds to those schools that had been selected to participate. Most districts computed these allocations according to the number of participating students in each school.

Tables 3-6 through 3-9 indicate local administrators' views of Title I school selection provisions, as well as policies they would prefer in the absence of legal criteria for school selection. Table 3-6 presents district officials' assessments of the school or student selection procedures most crucial for maintaining the goals of the Title I program. Of interest, only 18 percent of the mail survey respondents cited the need to concentrate services.

Table 3-7 presents district officials' opinions regarding the most burdensome aspects of the present school and student selection requirements. Twenty-six percent of the mail questionnaire respondents reported that the burden associated with these

TABLE 3-4

PRIMARY OUTCOME DESIRED IN CHOOSING
DATA SOURCES AND SELECTION PROCEDURES

	<u>Percent</u>
Service to maximum number of schools or students	58
Service to some areas or schools from previous year	33
Concentrate services on a small number of schools or students	6
Other	3
	<hr style="width: 100%; border: 0.5px solid black; margin-bottom: 5px;"/> (264)

TABLE 3-5

CRITERIA USED TO ALLOCATE TITLE I
DOLLARS TO PARTICIPATING SCHOOLS

	<u>Percent*</u>
Number of students selected for services	75
Prorated based upon previous years allocation	19
Informal judgment of need	18
Poverty level of school	11
Other	8
	—
	(250)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 3-6

PERCEIVED SCHOOL AND STUDENT SELECTION PROCEDURES
OR REQUIREMENTS MOST CRUCIAL FOR MAINTAINING
GOALS OF TITLE I PROGRAM

	<u>Percent*</u>
Plan according to educational needs assessment and evaluation	26
Concentrate services	18
Other (combined category)	17
Involve teacher	16
Select educationally disadvantaged students	14
Flexible selection to serve individual students	4
Involve PAC	3
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (364)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 3-7

PERCEIVED MOST BURDENSOME ASPECTS OF TITLE I SCHOOL
AND STUDENT SELECTION REQUIREMENTS

	<u>Percent*</u>
No problems	26
Testing students/evaluation	12
Paperwork	11
Poverty level criteria	8
Comparability	7
School/district advisory councils	4
Limiting funds to targeted schools	3
Compliance with regulations	2
Other aspects	2
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (336)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 3-8

PREFERRED CHOICES FOR SCHOOL SELECTION CRITERIA,
IF NO REQUIREMENTS WERE IMPOSED

	<u>Percent Small Districts</u>	<u>Percent Medium Districts</u>	<u>Percent Large Districts</u>	<u>Percent All Districts</u>
Primarily achievement data	76	54	47	64
Primarily poverty data	6	9	10	8
Give both ^e equal weight	18	35	43	28
Other	0	2	0	1
	<hr/>	<hr/>	<hr/>	<hr/>
	(128)	(93)	(36)	(257)

3-18

TABLE 3-9

ASSESSMENT OF THE CRITERIA FOR SCHOOL SELECTION THAT ACTUALLY
WOULD BE USED IN THEIR DISTRICTS IF NO REQUIREMENTS WERE IMPOSED

	<u>Percent Small Districts</u>	<u>Percent Medium Districts</u>	<u>Percent Large Districts</u>	<u>Percent All Districts</u>
Primarily achievement data	77	58	57	67
Primarily poverty data	3	8	10	6
Give both equal weight	20	30	32	26
Other	0	3	0	1
	<hr/>	<hr/>	<hr/>	<hr/>
	(107)	(82)	(35)	(224)

3-19

requirements posed no problems. Eight percent, however, cited the obligation to use poverty level criteria, while 4 percent mentioned the requirement that funds had to be limited to targeted schools.

Tables 3-8 and 3-9 indicate the mail survey respondents' preferred criteria for school selection, as well as the criteria they expect would be used in the absence of legal requirements. These data, reported by district size, indicate a preference for achievement data over poverty data, particularly in small districts.

Tables 3-10 through 3-17 report district officials' interpretations and assessments of ECIA school selection provisions. While Table 3-10 shows that 70 percent of the districts will continue to serve the same schools now served under Title I, Tables 3-11 and 3-12 indicate that substantial numbers of local administrators view ECIA as not requiring services to schools in order of poverty ranking.

Table 3-13 shows that a substantial minority of districts, particularly small districts, believe they will qualify all their schools under ECIA's "uniformly high concentration" provision, though they do not now qualify under the Title I "no wide variance" clause.

Table 3-14 indicates that 30 percent of the school districts believe their flexibility will be reduced by ECIA's failure to include Title I school selection options among the new statutory provisions. Table 3-15 reports those districts' perceptions of the current Title I options thought to provide

TABLE 3-10

EXPECTED PRACTICES ASSUMING LOCAL DISCRETION UNDER ECIA TO
 DEFINE "HIGHEST CONCENTRATIONS OF LOW-INCOME CHILDREN"

	<u>Percent</u>
Continue to serve same schools/areas	70
Probably serve more schools/areas	10
Probably serve same number of schools/areas but some different from those now served	9
Probably serve fewer schools/areas	4
Informed interpretation not possible at this time	8

	(218)*

*Responses sought only from districts having more than one school.

TABLE 3-11

TITLE I DIRECTORS' INTERPRETATIONS OF ECIA
 "HIGHEST CONCENTRATIONS" PROVISION

	<u>Percent</u>
Serving in strict order areas with concentrations as high or higher than average	37
Serving areas with concentrations as high or higher than average, but not necessarily in strict rank order	22
Serving areas having above a certain percent of low-income students	12
Other	11
Don't know	1
No answer given	17
	<hr style="width: 10%; margin: 0 auto;"/> (100)

TABLE 3-12

LIKELY DISTRICT POLICIES IF NO ADDITIONAL GUIDANCE RECEIVED
CONCERNING ECIA "HIGHEST CONCENTRATIONS" PROVISION

	<u>Percent</u>
Serving areas with concentrations as high or higher than average, but not necessarily in strict order	26
Serving in strict order areas with concentrations as high or higher than average	23
Serving areas having above certain percent of low-income students	13
Don't know	4
Other--e.g., serve all schools equally; serve all possible schools (all less than 4%)	14
No answer given	20
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (100)

TABLE 3-13

PERCENTAGE OF DISTRICTS EXPECTING TO QUALIFY UNDER ECIA'S
"UNIFORM HIGH CONCENTRATION" PROVISIONS

	Percent Small <u>Districts</u>	Percent Medium <u>Districts</u>	Percent Large <u>Districts</u>	Percent All <u>Districts</u>
Will qualify because presently qualified under "no wide vari- ance" option	50	30	8	36
Will qualify under new provision though not presently qualified	18	15	9	15
Will not qualify because district variances still too large	8	40	74	31
Informed interpretation not possible	24	14	9	18
Other	0	1	0	1
	<u>(96)</u>	<u>(80)</u>	<u>(34)</u>	<u>(210)*</u>

*Responses sought only from districts having more than one school.

TABLE 3-14

PERCEIVED EFFECT ON DISTRICT FLEXIBILITY OF ECIA'S
ELIMINATION OF TITLE I SCHOOL SELECTION OPTIONS.

	<u>Percent</u>
Flexibility would not be limited	57
Flexibility would be limited	30
Informed interpretation not possible	13
	<u> </u>
	(215)*

*Responses sought only from districts having more than one school.

TABLE 3-15

TITLE I SCHOOL SELECTION OPTIONS PERCEIVED
TO AFFORD FLEXIBILITY

	<u>Percent*</u>
Formerly eligible option	57
Ranking and selection by low achievement	54
25 percent rule	43
No wide variance rule	42
Grade span ranking	35
Skipping schools receiving state compensatory services similar to Title I	24
Use of enrollment data	21
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (58)**

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

**Responses sought only from mail survey districts perceiving loss of flexibility due to ECIA's elimination of Title I school selection options.

TABLE 3-16

DISTRICTS' INITIAL ASSESSMENT OF ECIA SCHOOL
AND STUDENT SELECTION PROVISIONS

	<u>Percent Small Districts</u>	<u>Percent Medium Districts</u>	<u>Percent Large Districts</u>	<u>Percent All Districts</u>
Needless restriction on local practices	10	15	9	11
Provide needed flexibility	43	30	24	38
Provide flexibility, but services may be diluted at expense of students presently in program	46	53	67	49
Other	1	2	0	1
	<hr/>	<hr/>	<hr/>	<hr/>
	(220)	(82)	(34)	(336)

TABLE 3-17

ANTICIPATED EFFECTS OF ECIA STUDENT
AND SCHOOL SELECTION PROVISIONS

	<u>Percent*</u>
May increase flexibility, but might increase difficulty of implementation, change intent of program, or result in general aid or wasted funds	53
Little, if any, effect	29
Changes are positive	20
Change will occur in selections	14
Proper use of flexibility will depend on district's integrity	13
Other--e.g., want little change; ambiguous (all less than 4%)	20
	(83)

Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

flexibility. These districts reported that the formerly eligible and low achievement options, in particular, provided important flexibility. Other options were also deemed to offer considerable flexibility.

Tables 3-16 and 3-17 report initial, overall assessments of ECIA's school and student selection provisions. Approximately half the respondents believed that ECIA may afford flexibility, but that services may be diluted at the expense of students currently in Title I programs.

SUMMARY

Most districts, using tallies of students receiving free or reduced price lunches, identified and selected for Title I services all schools that could be deemed eligible. To this end, a number of districts experimented with alternative school selection methods to see in advance the results they would produce.

Many districts, however, were unaware of the options available under Title I. Districts that were aware of the options used them with some frequency, and a substantial percentage of districts believed their elimination under ECIA would reduce flexibility. A majority of districts, however, did not perceive a loss of flexibility under ECIA.

In fact, district officials' initial assessment of ECIA provisions was that they allow more schools to be deemed eligible. Many, however, believed services under Title I, resulting in reduction of services to students currently in Title I programs.

CHAPTER 4

STUDENT SELECTION

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

- Did districts tend to select all eligible students or did they select recipients from a pool of those eligible?
 - Forty-four percent of the districts served all eligible students, while 56 percent of the districts selected program participants from an eligible pool; however, the percentages varied by district size (50 percent of the small districts served all eligible students, while the percentages for medium, large, and certainty districts were 29, 19, and 28, respectively).
- What processes did the districts use to select students?
 - Nearly all districts used cutoff scores on achievement tests to select students, but they were used exclusively in only some districts; three-fifths of all districts reported that teachers could decide to give Title I services to students above the cutoff; a similar number of districts reported that teachers could decide that students below the cutoff did not need the services; 25 percent of the districts reported that one factor considered was a student's potential for success.
- What did district officials believe might be the effects of Chapter 1, ECIA student selection requirements?
 - Most Principals and Title I Directors expected to use Title I funds for non-Title I students under ECIA's "utilize part" provision; and 39 percent of the Title I Directors expected reduction or dilution of services to current program participants as a result. Seventy-one percent of the Principals said that they favored the "utilize part" provision, but 38 percent warned that a diluted effect or abuses of Title I funding could be expected; 60 percent of the Title I Directors expected little or no change in the student population served as a result of the ECIA "permits" provision, but over one-third of the Title I Directors expected that districts would serve students who could benefit the most and not necessarily those students furthest behind.

- Does participation of limited-English-proficient [LEP] and handicapped students vary significantly among districts?
 - Practices among districts ranged from including all LEP and handicapped students in Title I to excluding all of them from Title I.
- Are LEP and handicapped students selected under the same criteria as other program participants?
 - Some districts identified a number of conditions which affected these students' eligibility for Title I.
- Are there differences in the extent to which handicapped students are selected, as compared to LEP students?
 - LEPs were more likely to be admitted to Title I than were handicapped students.
- Do program administrators support district policies regarding participation of LEP and handicapped children?
 - Most Title I Directors and Principals favored their districts' policy or practice for serving LEPs and handicapped students in Title I.
- What are teachers' views concerning program participation of LEP and handicapped children?
 - Regular classroom teachers more strongly favored serving multiply eligible students in Title I than did Title I instructors.

INTRODUCTION

This chapter has two parts. Part one concerns the selection of students--other than students with limited-English proficiency [LEP] or a handicapping condition--for participation in Title I programs. Part two discusses Title I participation by LEP and handicapped children. This division of the chapter reflects two significant considerations: (1) the legal provisions governing Title I participation by LEP and handicapped children were different from those applicable to other students, and (2) the questions raised by handicapped or LEP students' selection for Title I were often unique for these two groups.

SELECTION OF TITLE I STUDENTS OTHER THAN LEP OR HANDICAPPED STUDENTS.

Summary of Legal Requirements

From the student populations of schools chosen to receive Title I funds, Title I regulations required districts to select students with the greatest need for compensatory educational services (§123(a)).* "Greatest need" was defined in the regulations as furthest behind in educational attainment. It was commonly understood, however, that the educable and trainable mentally retarded, those furthest behind in a literal sense, were not the primary intended program beneficiaries. These students were eligible, though, if they were able to benefit from services designed to address special needs caused by educational

*The reference is to the Title I statute. Statute citations can be distinguished from citations to regulations by the latter's use of a decimal point (e.g., §201.140).

deprivation (S. Rep. 856, 95th Cong., 2d Sess. 1978, p. 13; 46 F.R. 5136 et seq., §201.149(c), January 19, 1981).

Determinations of "greatest need" had to be made through an annual needs assessment (§124(b)). First, a school district had to use "existing and--to the extent possible--objective data" to identify the educationally deprived children (§201.101). Then, a district had to use "specified criteria" and, again, "to the extent possible, objective data" to select actual participants from among those eligible (§201.103(a)). Children in greatest need were those educationally deprived children who rank lowest based on whatever educational criteria an LEA uses . . . to identify and select Title I participants" (Comment to §201.103, 46 F.R. 5220, January 19, 1981). The selection of the neediest students according to this method significantly affected the allocation of Title I resources, since LEAs were required to distribute their Title I funds "on the basis of the number and needs of [the] children to be served as determined in accordance with [the needs assessment requirement]" (§124(e)).

The "greatest need" requirement was modified, however, by three other policies: First, educationally deprived children selected under greatest need criteria in a previous year could continue in Title I programs although they had improved and were no longer furthest behind (§123(b)). Second, a Title I participant who transferred midyear to a non-Title I school could continue in the program for the remainder of that school year (§123(c)). Third, children who were receiving state compensatory education services of the same nature and scope as those provided

under Title I could be skipped in the selection of Title I program participants (§123(d)).

Title I was amended in 1978, and legal standards that were included in or adopted shortly after these amendments modified the requirement that services be limited to educationally deprived children. One regulation specified that students otherwise ineligible could receive Title I services on an infrequent and incidental basis (§201.71(d), (1981)). Another provision allowed educators paid by Title I to perform their fair share of noninstructional school duties (hall or cafeteria monitoring, for example), even though such services constituted general, not categorical, assistance. A third provision allowed very high-poverty schools to operate Title I schoolwide projects and thereby serve all students in the school. Each of these modifications, however, was limited by standards intended to prevent dilution of services to eligible Title I schools and students.

Though the Chapter 1, ECIA "Declaration of Policy" retains the central Title I focus on educationally disadvantaged children, one provision of the Act states that school districts need only have a procedure that "permits" selection of students in greatest need (P.L. 97-35, §556(b)(2)). Chapter 1 regulations, issued July 29, 1982, do not elaborate the statute, but the Department of Education's [ED's] comments accompanying the regulations indicate that this provision should not be "read to allow services to be provided to children with lesser needs, while leaving more severely educationally deprived children with no services from any source" (47 F.R. 32873 (July 29, 1982)).

A draft nonregulatory guidance document issued by ED April 22, 1982* states that the "permits" provision implicitly retains two Title I policies--district discretion to skip educationally deprived children receiving compensatory services from other sources, and discretion to continue service to students selected in a previous year who are no longer in greatest need:

An LEA may choose to skip certain educationally deprived children who may be receiving adequate services from other sources. Similarly, an LEA may continue to provide Chapter 1 services to an educationally deprived child even though he or she is not one of the children who is currently most in need of special assistance.

Chapter 1 also authorizes districts to "utilize part" of their Chapter 1 funds for "all such children," interpreted in §200.49 of the regulations to mean "all educationally deprived, low-income children served by the LEA." The draft guidance document states this clause "provides a new option that was not available under Title I," since it allows services to students not enrolled in an eligible school (pp. 6-7). The document states, however, that services for these children must address their "special educational needs" (p. 9).

Chapter 1 retains the needs assessment requirement (§556(b)(2)), but Chapter 1 regulations do not further explain.

*U.S. Department of Education, Nonregulatory Guidance to Assist State Educational Agencies in Administering Federal Financial Assistance to Local Educational Agencies for Projects Designed to Meet the Special Educational Needs of Educationally Deprived Children under Chapter 1 of the Education Consolidation and Improvement Act of 1981 (April 22, 1982, draft).

the statutory language. The draft guidance document suggests, as one possible option, a procedure similar to that found in previous Title I regulations (p. 11).

Unlike Title I, Chapter 1 contains no requirement that funds be distributed to schools according to the "number and needs" of the children identified in the needs assessment. The draft guidance document also notes that districts are not required to serve attendance areas according to their concentrations of children from low-income families (p. 8).

Summary of Findings

The District Practices Study mail survey found that 44 percent of the districts (50, 29, 19, and 28 percent of the small, medium, large, and very large districts respectively) provided Title I services to all eligible students, while the remainder selected program participants from an eligible pool. These data must be considered with caution, though, since districts did not necessarily use identical concepts of eligibility. In one district, officials might have considered only students scoring below the 25th percentile on a standardized test to be eligible and, based on that assumption, reported that the district served all eligible students. Another district might have deemed all students scoring below the 50th percentile to be eligible, but reported that the district selects from this pool of eligible students only those scoring below the 25th percentile. Thus, identical practices might have been characterized differently, depending on a district's definition of eligibility.

Tables 4-1 through 4-4 report the procedures districts used to identify the children who received Title I services. These data show that nearly all districts used standardized tests, but teacher judgment was also a significant factor.

The data also indicate that selection of students for Title I programs was often a flexible, and sometimes elaborate, procedure involving several nuances and exceptions to general rules.

For example, in one district six factors influenced selection of students to participate in Title I: (1) California Achievement Test [CAT] score; (2) whether a student was previously served in Title I; (3) referral by a regular program teacher; (4) score on locally made screening tests; (5) whether state compensatory education services were available; and (6) whether individual Title I teachers had space available for more students. In this district, CAT scores were the main criterion for selection, and the 45th percentile was the usual cutoff point. Those scoring lowest were generally selected first, unless state compensatory education services were available at the grade level in question and the student was among the 30 scoring lowest, who were customarily selected for the state program.

In this same district, which was typical of many others, selection by lowest score, however, was not uniformly followed.

A student referred by her or his regular program teacher, and who scored below grade level on the local screening tests, could be given priority over a student with a lower CAT score. Conversely, a student initially selected for Title I based upon a

TABLE 4-1

REPORT OF WHETHER CUTOFF CRITERION FOR STUDENT SELECTION WAS FIRM OR WHETHER OTHER FACTORS WERE ALLOWED TO AFFECT SELECTION

	<u>Percent*</u>
Teachers may decide to give assistance to students above cutoff point	61
Teachers may decide some students below cutoff point do not need services	59
Cutoff criterion quite firm/exceptions rare	47
Students previously receiving services may qualify even if above cutoff	40
Students with handicaps may qualify even if above cutoff	29
Students with limited-English proficiency may qualify even if above cutoff	27
Potential for success is a factor	25
Other/nonspecified	6
	(1,637)**

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

**Number in parentheses below line in this and all subsequent tables is the number of respondents to this item.

TABLE 4-2

STUDENT SELECTION PRACTICES AND PROCEDURES
REPORTED BY TITLE I DIRECTORS

	<u>Percent*</u>
Cutoff between 25th and 49th percentile	33
Combination of test scores and teacher judgment, emphasis on test scores	31
Combination of test scores and teacher judgment, emphasis on teacher judgment	29
Preference for students previously served	19
Some students above cutoff served	19
Exceptions to procedure allowed	18
Combination of test scores and teacher judgment, with no emphasis on either	16
Test scores only	15
No exceptions to procedure allowed	12
All students below cutoff served	12
No student above cutoff served	9
Parental judgment considered	8
Cutoff between 1st and 24th percentile used	7
Not all students below cutoff served	6
Other--e.g., students who can best benefit; no cutoff score; no preference for students previously served (all 4% or less)	11
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> 100

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 4-3

PROCEDURES USED TO SELECT TITLE I STUDENTS
REPORTED BY PRINCIPALS

	<u>Percent*</u>
Test scores	74
Teacher referral	69
No exceptions to procedure	24
Lowest ranking students served first	14
Previously served students eligible	9
Parent referral	5
Other--e.g., classroom performance; some students above test score cutoff (all less than 3%)	8
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (97)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 4-4

PROCEDURES USED TO SELECT TITLE I STUDENTS
REPORTED BY TITLE I INSTRUCTORS

	<u>Percent*</u>
Test scores	99
Teacher referral	77
Previously served students eligible	17
No exceptions to procedure	16
Parent referral	9
Lowest ranking students served first	8
Some students above test score cutoff served	7
Success in classroom is a factor	6
Other--e.g., health, socioeconomic, and race are factors; duplicative services excluded (all less than 3%)	3
	(98)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

low CAT score could be returned to the regular program if she or he scored at grade level on the local screening tests. Whether the student was previously served was also relevant, since these students were given priority. Some students scoring above the 45th percentile, and even at the 60th or 70th percentile, could be selected for the program in this district*. This was particularly likely if they were previously served, the regular teacher wanted them in the program, they scored below average on the screening tests, and a given Title I service appropriate for their needs (such as a reading lab) had space available.

Another district also used a combination of test scores and teacher judgment in selecting Title I students; however, the order in which those factors were applied was reversed. Teachers made an initial determination of the pool of students likely to need compensatory services, and only those students were tested.** This contrasts with the first district described,

*ED's 1982 Report to Congress suggests that this was not an isolated case: "Difficulties in targeting services on the neediest is evident, . . . 457,000 (16 percent of the students in Title I) placed in the upper half of the distribution," of achievement test scores. District Practices Study data, moreover, revealed that despite the "greatest need" provision, 25 percent of the districts reported that one factor considered in selecting students was "potential for success" in the Title I program. It is not known, however, whether all districts considering this factor would tend, for this reason, to select relatively higher scoring students.

**Another district that relied most extensively on teacher judgment rather than test scores reported two types of problems occasionally had emerged: (1) teachers sending students to Title I solely because they had behavior problems; and (2) teachers selecting too many students in an effort to get more Title I resources for their school.

which made initial selections based upon test scores, but allowed these decisions to be overridden by subsequent teacher assessment.

Teacher judgment was used only to a limited extent in another district. Students were selected according to test scores, and teacher judgment was used only to determine whether a student should be retested because of questions about the validity of the initial test scores.

A different use of test scores and teacher referrals occurred in another district, which during the course of the year, frequently changed the population served by Title I. An initial pool of students was deemed eligible on the basis of test scores. Then teachers referred different groups continuously throughout the year for Title I services, depending upon which students seemed to need Title I most at the time.*

Interviews conducted during the study indicated that a substantial proportion of Principals and non-Title I teachers preferred to change aspects of the student selection procedures used in their schools. In fact, 50 percent of the Principals interviewed stated they implemented parts of the student selection procedure solely to comply with legal requirements. Of the Principals who, but for legal requirements, would make changes, 37 percent said they desired to serve higher-scoring students, rather than those furthest behind.

*This district reported that a primary result of the selection method was provision of services to students other than those identified as eligible for Title I. The Principals and teachers in this district expressed considerable satisfaction with this arrangement.

Those Principals, however, apparently included many who were misinformed about the law. In response to the same question, 41 percent stated they would prefer to use more teacher judgment in the student selection, 35 percent stated they would rely less on test scores, 8 percent said they wanted to discontinue exclusion of handicapped children, and 6 percent stated they wanted to look more closely at skills needed by the program participants. Federal law prohibited none of these practices.

Non-Title I teachers were found to share many of the Principals' sentiments, though 37 percent said they would make no changes in the student selection process used by their schools. Thirteen percent wanted to give more emphasis to serving students best able to benefit from the program, and would like to see less emphasis on serving those furthest behind. Fourteen percent stated the program should not be limited to students from poverty areas. Twenty-one percent thought more teacher input and less reliance on tests would be desirable. Nineteen percent said they wanted to serve more students or more grades.

Table 4-5 reports data on a related topic, the extent to which districts were using the Title I option to serve non-Title I students on an "incidental basis." Thirty percent of the districts were unaware of this option, but, in general, it was more popular in smaller rather than larger districts. Thirty percent of the small districts used it, while the comparable figure for large districts was 16 percent. Interviews of Title I teachers indicated that 26 percent of the teachers provided Title I services to non-Title I students.

TABLE 4-5

PERCENT USE OF 1978 PROVISION ALLOWING SERVICE
TO NON-TITLE I STUDENTS ON "INCIDENTAL BASIS"

DISTRICT SIZE

	<u>Percent Small Districts</u>	<u>Percent Medium Districts</u>	<u>Percent Large Districts</u>	<u>Percent All Districts</u>
Aware of provision but do not use it; services are strictly limited to eligible students	40	54	63	45
Not aware of provision	31	31	22	30
Some non-Title I students are receiving services	30	15	16	26
	<hr/>	<hr/>	<hr/>	<hr/>
	(300)	(97)	(433)	(36)

Another Title I option, continuation of services to students transferred mid-year to non-Title I schools, was found to be used in half the districts experiencing such transfers. These districts, however, were only 3 percent of the total districts surveyed by mail.

Tables 4-6 through 4-10 report local officials' views of the Chapter 1, ECIA "permits" and "utilize part" provisions.

Seventy-one percent of the Principals favored the "utilize part" clause (Table 4-8), but 38 percent agreed with 60 percent of the Title I Directors that dilution of services to those currently in Title I programs might result (Tables 4-7 and 4-9). Forty-four percent of the districts surveyed said they would not "utilize part" of their funds for students not now served, but an equal percentage of districts said they would. Thirty percent, though, said they would do so on a minimal basis (Table 4-6).

Table 4-10 indicates that, under the "permits" provision, only 37 percent of the districts planned to limit participation in their programs to students furthest behind. Seventeen percent of the Title I Directors reported that pressures exist to serve students other than those in greatest need.

Summary

Approximately half of the school districts, but many more small districts than large districts, reported serving all students eligible for Title I programs. Eligibility and selection involved use of achievement test results and "cutoff" scores in nearly all districts, but overall, the student selection process

TABLE 4-6

REPORTS OF LIKELY DISTRICT PRACTICES UNDER
CHAPTER 1 "UTILIZE PART" PROVISION

	<u>Percent</u>
No change/will only provide services to selected students	44
Some schools occasionally may provide minimal services to other students	24
Most schools occasionally may provide minimal services to other students	8
Some schools regularly may provide services to other students	3
Most schools regularly may provide services to other students	6
Informed interpretation is not possible	15
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (341)

TABLE 4-7

TITLE I DIRECTORS' EXPECTATIONS REGARDING EFFECTS
OF THE CHAPTER 1 "UTILIZE PART" PROVISION

	<u>Percent*</u>
Will dilute services	60
Will not affect district much	40
Will be able to serve more students	13
Program will become general aid	11
Will not reduce services in district	8
Distribution will be based more on educational deprivation than economic need	8
Other--e.g., does not pose threat; PAC will not permit misuse of funds (all less than 5%)	20
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (86)

*Percentages do not total to 100 percent since more than one response to the question was permitted.

TABLE 4-8

PERCENT OF PRINCIPALS WHO FAVOR "UTILIZE PART"
PROVISION OF CHAPTER 1

	<u>Percent</u>
In favor	71
Not in favor	16
No answer given	7
Don't know	6
	<hr/>
	(249)

TABLE 4-9

PRINCIPALS' EXPECTATIONS REGARDING EFFECTS OF
CHAPTER "1 UTILIZE PART" PROVISION

	<u>Percent*</u>
Dilution/abuses of Title I funding	38
Serve marginal students	22
Use Title I materials for all	22
No change in overall effectiveness	22
Better able to serve children	12
After Title I students are served, serve marginal students	7
	(249)

*Percentages do not total to 100 percent since more than one response to the question was permitted.

TABLE 4-10

REPORT OF LIKELY DISTRICT POLICIES UNDER CHAPTER 1
 PROVISION REQUIRING PROCEDURE THAT "PERMITS"
 SELECTION OF STUDENTS IN GREATEST NEED

	<u>Percent</u>
No change--continue to serve only students furthest behind	37
May serve some students not furthest behind if they can benefit from program	39
Primarily serve students furthest behind; some funds to other "special need" students (e.g., gifted and talented students)	11
Use most funds for other "special need" students while serving some students furthest behind	1
Informed interpretation not possible at this time	12

(344)

was flexible, employed teacher judgment, and included discretion to select some students scoring above the cutoff, as well as to reject some who scored below.

District officials, for the most part, expected the Chapter 1, ECIA "permits" provision to alter somewhat the population receiving Federal compensatory services; most Title I Directors, however, believed the ECIA "utilize part" provision might produce some changes, including dilution of services to those now participating in Title I.

SELECTION OF LEP AND HANDICAPPED STUDENTS FOR TITLE I PROGRAMS

The first section of this chapter discussed policies and practices of school districts for selecting students, other than the handicapped or those with limited-English proficiency, to receive Title I services. This section focuses upon students who are eligible for both Title I and one or more other categorical programs, specifically, English as a second language [ESL] or bilingual, or special education programs. Regarding district practices in this area, the data reveal the following:

- Practices among districts ranged from including all LEP and handicapped students in Title I to excluding all of them from Title I.
- Some districts identified a number of conditions which affected these students' eligibility for Title I.
- LEPs were more likely to be admitted to Title I than were handicapped students.
- Most Title I Directors and Principals favored their districts' policy or practice for serving LEPs and handicapped students in Title I.

- Regular classroom teachers more strongly favored serving multiply eligible students in Title I than did Title I instructors.

Summary of Legal Requirements

Students who are educationally deprived due to limited proficiency in English or a handicapping condition have been considered legally eligible for Title I services since the beginning of the program in 1965. The Supreme Court's decision in Lau v. Nichols, 414 U.S. 563 (1974), however, and congressional enactment of §504 of the Rehabilitation Act of 1973 (29 U.S.C. §706) and P.L. 94-142's amendments to the Education of the Handicapped Act (20 U.S.C. §1401, et seq.) raised questions concerning the provision of Title I services to LEP and handicapped students.

In Lau the Court held that districts receiving Federal funds must take affirmative steps, using non-Federal funds, to ensure the effective participation of LEP children in school programs. The decision was based on Regulations interpreting Title VI of the Civil Rights Act of 1964, which prohibits recipients of Federal aid from discriminating on the basis of national origin.

This decision posed a problem in legal interpretation under Title I. Three principles needed to be reconciled: (1) students could not be excluded from Title I programs because of their national origin; (2) districts had to use non-Federal funds to ensure effective participation of LEP children in school programs, and (3) Title I services had to supplement not supplant

services required to be provided with non-Federal funds. The apparent dilemma was that exclusion of LEP children from Title I programs might appear to violate the first principle, while inclusion of these students might imply that they were not participating effectively in regular school programs and that Title I funds were being used for services non-Federal funds should provide.

P.L. 94-142 and §504 posed a similar problem regarding handicapped students. These laws required districts receiving Federal funds to use non-Federal funds to provide handicapped students an appropriate education. They also prohibited districts from limiting handicapped students' access to any special or regular programs. Again, the apparent dilemma was that handicapped students could not be denied Title I services merely because they were handicapped. However, if they were included in Title I programs, it might be the case that the district was failing to meet its obligation to use non-Federal funds to provide them an appropriate education. That is, that Federal funds were being used to supplant rather than supplement the services which states and local school districts were to provide.

Title I regulations promulgated January 19, 1981 (46 Fed. Reg. 5136, et seq.), established detailed standards addressing the issues involved in serving LEP and handicapped students in the Title I program (§§201.140-201.141). These standards reflected three general principles: (1) Title I funds should not be used to meet obligations imposed by other Federal or state

laws; (2) Title I programs had to be designed to address special needs resulting from educational deprivation, not needs relating solely to a handicapping condition or limited proficiency in English; and (3) students should be selected for Title I programs based on uniform criteria, applicable to all students and relating to educational deprivation.

ECIA retains the requirement that Chapter 1 services supplement, not supplant, services required to be provided with non-Federal funds and Title VI, §504 and P.L. 94-142 have not been repealed, but neither ECIA nor its implementing regulations set standards--similar to the January 19, 1981, Title I regulations--for provision of Chapter 1 services to handicapped or LEP students.

Summary of Findings

District Policies and Practices for Serving Handicapped and LEP Students in Title I Programs

In general, LEP students were more likely to be admitted to the Title I program than were handicapped students in districts where both groups attended. Forty-four percent of the districts reported that all handicapped students in Title I schools who met the cutoff criteria were eligible for Title I services; on the other hand, about one-fourth of the districts reported that no handicapped students were eligible (see Table 4-11). In comparison, 67 percent of the districts that served LEPs indicated that all limited or non-English-proficient students were deemed eligible for Title I services if they met the Title I cutoff. Only 5 percent of the districts considered LEPs ineligible for Title I.

Moreover, 14 percent of the districts which had LEP students reported that only LEPs were eligible for Title I; that is, the Title I program was designed specifically to serve LEP students.

There are at least three possible explanations for the reported exclusion of all handicapped students from the Title I program in 24 percent of the districts surveyed. First, school districts may have automatically excluded handicapped students, in which case they would have been in violation of Section 504 of the Rehabilitation Act of 1973 and of Title I guidelines. ~~Of~~ districts may have considered handicapped students ineligible for Title I because they could not benefit from the program. Finally, Title I Directors may not have been aware of who was legally defined as handicapped. For example, some Title I Directors did not know that speech impairment is one kind of handicap.

Approximately one-third of the mail questionnaire respondents (32 percent) reported that handicapped students could receive Title I services under certain conditions (see Table 4-11). Conditional criteria for the inclusion of LEP students were used in only 15 percent of the districts. A number of the conditions mentioned for the inclusion of handicapped students in Title I were the same as those mentioned for the inclusion of LEP students. Some examples were:

- If the student could benefit from Title I
- If the student needed Title I

TABLE 4-11

USUAL DISTRICT POLICY OR PRACTICE FOR DETERMINING TITLE I
ELIGIBILITY FOR HANDICAPPED AND LEP STUDENTS

<u>Handicapped Districts</u>		<u>LEP Districts*</u>	
All handicapped students in Title I schools who meet the cutoff criteria are eligible for Title I	44	All limited or non-English-proficient students in Title I cutoff criteria are eligible for Title I	67
Students are eligible depending on certain conditions	32	Students are eligible depending on certain conditions	15
		Title I serves only limited-English-proficient students	14
No handicapped students are eligible for Title I	24	No limited or non-English-proficient students are eligible for Title I	5
	<hr/>		<hr/>
	(415)		(72)*

*This small N results from the relatively small proportion of districts nationwide that enrolled a substantial number of LEP students.

- If the student could function in the Title I class
- If the student qualified for Title I under the standard district selection procedures

Some districts' practices in serving handicapped students in the Title I program were based on policies which included some types of handicapped students in the program while excluding others. There was a tendency for students who were speech impaired, physically handicapped, emotionally disturbed, visually handicapped, or hearing impaired to be eligible for Title I, while educable mentally retarded [EMR] and trainable mentally retarded [TMR] students tended to be excluded.

One of the most difficult decisions for local administrators providing Title I services to handicapped students was whether learning disabled [LD] students should be included in the Title I program. More Title I and Special Education Directors deemed LD students eligible than ineligible for Title I, but the reverse was true for Principals. This difference in the reporting of policy for LD students probably reflects the difficulty of establishing policy in the LD area.

Sometimes districts did not have policies to exclude multiply eligible students from Title I programs, but in practice few of these students were served in Title I. For example, one district had no policy that prohibited serving LEPs in Title I, but in order to receive Title I services, students had to score below a certain cutoff level on an achievement test administered in English. Since LEPs were not given achievement tests in English until the third grade, the result was that all LEPs below

the third grade did not receive Title I services. The policy of several districts was to include handicapped students in Title I if there was space; in practice, there was no space. Another district's policy was to consider handicapped students eligible for Title I, yet in practice only the speech impaired were participants in the Title I program in that district.

Another factor in determining whether handicapped or LEP students should be included in Title I was scheduling. Both administrators and teachers expressed concern about pulling students out of the classroom for an extended period of time and fragmenting the instructional program. Districts developed different policies to deal with the scheduling problem. For instance, districts frequently did not serve handicapped or LEP students in the Title I program if they received more than half of their instruction outside the regular classroom. Decisions about the inclusion of handicapped students in the Title I program were frequently made (45 percent of the case study districts) during school-based, handicapped students' multidisciplinary team meetings. In these districts, the selection of multiply eligible students into the Title I program was based on one or more of the following procedures: (1) conducting intensified testing, (2) letting parents pick the program they preferred, (3) making the decision during a staff team meeting, and (4) basing the decision on space available in the program. However, 36 percent of the Title I Directors in districts with LEP students reported their districts did not have a special

formal policy regarding the selection of LEP students into the Title I program, and 58 percent of the Title I Directors in districts with handicapped students reported no special procedures for identifying and selecting handicapped students for Title I services. Thirty-five percent said that such a formal policy existed in their district; 58 percent said that it did not.

When Title I instructors were interviewed to find out if they were teaching LEP and handicapped students during the prior school year as well as the current school year, 32 percent reported that they had LEP students in the Title I program this year, and 31 percent reported them in the program the previous year (see Table 4-12). Thirty-two percent of these instructors reported they were serving handicapped students in Title I this year and 41 percent said that they had served them the previous year. We can only speculate that the difference in percentage between the number of Title I instructors reporting serving handicapped students resulted because the data were gathered at the start of the school year and thus the identification of students needing special education might not have been completed.

The majority of districts indicated no changes over the past three years in policies for serving handicapped and LEP students in the Title I program. The mean length of time the current policy or practice had been in effect was 3.2 years for providing Title I services to LEP students and 5.7 years for handicapped students.

TABLE 4-12

TITLE I SERVICES TO LEP AND HANDICAPPED STUDENTS
 DURING 1980-81 AND 1981-82 SCHOOL YEARS
 REPORTED BY TITLE I INSTRUCTORS

	<u>1980-81</u>	<u>1981-82</u>
Percent of Title I instructors who reported teaching LEPs in Title I.	31	32
Percent of Title I instructors who reported teaching handicapped students in Title I.	41	32
	(275)	

While the majority of ESL/Bilingual Directors and Special Education Directors reported that Title I funds played no role in deciding grade levels, subject, or program design in their programs, 18 percent of the Special Education Directors suggested that Title I reduced the number of referrals to special education and/or the number of students receiving special education. The following examples are illustrative:

- There was an increase in special education after the sixth grade when Title I ended.
- When Title I was added to the junior high, there was a decrease in requests for special education money at this level.
- Title I provides enough remedial service to keep some students out of the LD program.

In summary, the practices among districts ranged from including all LEP or handicapped students in Title I to excluding them all. Some districts identified a number of conditions such as specific levels of English proficiency or severity of handicapping conditions which affected the decision of student eligibility for Title I. Generally, these policies enabled LEPs to be more readily admitted to Title I than are handicapped students.

Administrators and Teachers' Attitudes about Their Districts' Policies and Practices for Including Multiply Eligible Students in the Title I Program

During site visits, administrators and teachers were asked for their views on their districts' policies or practices of including or excluding LEP and handicapped students in the Title I program. In those districts for which this inquiry was relevant, a preponderance of Title I Directors favored their

current district policies (86 percent for both LEP and handicapped policies). These Title I Directors registered a slightly higher level of disapproval for their district's policies pertaining to handicapped students' participation in the program when compared to policies for LEP students (12 percent disapproval for handicapped policies vs. 9 percent disapproval for LEP policies). This slightly higher disapproval rate was due to less ambivalence about districts' policies on the participation of handicapped students in the Title I program (see Table 4-13). One should note, however, that this question as it pertained to LEP students was not relevant for 65 percent of the Directors because their districts had few or no LEP students. In contrast, only 14 percent of the Title I Directors deemed this question not applicable with regard to handicapped students.

Principals in Title I schools were less favorably disposed to their districts' policies on handicapped students' participation in Title I (see Table 4-13). A substantially higher percent of Principals for whom this question was relevant expressed ambivalence about their districts' policies or practices for including or excluding handicapped students in the Title I program (28 percent for Principals vs. 12 percent for Title I Directors). On the other hand, Principals' attitudes about these policies for LEP students were slightly more favorable than the Title I Directors' (90 percent favorable rating by Principals vs. 86 percent favorable rating by Title I Directors). The source of the Principals' dissatisfaction with the policies for handicapped

TABLE 4-13

ADMINISTRATOR ATTITUDES TOWARD DISTRICT POLICY/PRACTICES OF INCLUDING/EXCLUDING LEP AND HANDICAPPED STUDENTS IN TITLE I

	<u>Percent of Title I Directors</u>		<u>Percent of Principals</u>	
	Handicapped	LEP	Handicapped	LEP
Favor district policy/practice	74	30	59	34
Do not favor district policy/practice	11	3	10	3
Ambivalent about district policy/practice	1	2	29	1
Not applicable, missing data	14	65	2	61
	<hr/>	<hr/>	<hr/>	<hr/>
	(100)	(100)	(182)	(182)

students was highly specific to the districts' policies, but ranged from sentiments that the program was too exclusive to the program was too inclusive in its services to handicapped students. This dissatisfaction, where it did exist, often appeared to be related to the requirements of providing special services to handicapped students under P.L. 94-142 and other Federal and state special education mandates rather than exclusively with district-level Title I policy.

In response to a question about desired changes in the way students were selected for Title I, most regular teachers did not consider any changes in the procedure to be necessary.

When regular classroom teachers were interviewed regarding their preference for including LEP and handicapped students in Title I, 73 percent felt that LEPs should be able to receive Title I while 18 percent expressed no preference (see Table 4-14). Seventy percent said that handicapped students should be eligible for Title I; 17 percent felt that they should generally be excluded; and 13 percent said that it would depend on the type and severity of the handicap. Some teachers said that LEP students needed the extra help that Title I could provide especially in the areas of oral language, vocabulary, and reading, but 6 percent felt that LEPs should have their own program. Others felt that if other programs were not available for LEPs, they should then be served in Title I. Some teachers opposed serving LEPs in Title I because they felt that Title I teachers did not have the special training that is necessary to instruct LEP students.

TABLE 4-14

TEACHER PREFERENCES ON SERVING HANDICAPPED AND LER STUDENTS IN TITLE I

Regular Teacher

<u>Handicapped</u>		<u>LEP</u>	
<u>%</u>		<u>%</u>	
70*	Should be able to receive Title I services	73*	Should be able to receive Title I services
17	Should generally be excluded from Title I	18	No preference
13	Depends on the severity and/or type of handicap	6	LEPs should have their own program
18	Others--e.g., depends on the individual student; all nonhandicapped students should be served first (all 2% or less)	6	Title I could be used to help with oral language, vocabulary, and reading
		4	LEPs are low and need extra help
		17	Others--e.g., no special program is available for LEPs (all 3% or less)
<hr/>		<hr/>	
(198)		(200)	

Title I Instructor

<u>Handicapped</u>		<u>LEP</u>	
<u>%</u>		<u>%</u>	
28*	Should be in program	44*	Should be in program
16	Should not be in program	9	Should not be in program
18	No preference	18	No preference
31	Conditional/depends	29	Not available, missing response
6	Not available, missing response		
<hr/>		<hr/>	
(275)		(275)	

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

In comparison to the 73 percent of regular teachers who favored including LEP students in Title I, only 44 percent of the Title I instructors felt that LEPs should be included. Similarly, 70 percent of the regular teachers favored the inclusion of handicapped students in Title I while only 28 percent of the Title I instructors favored the inclusion of handicapped students in Title I (see Table 4-14). Thirty-one percent of the Title I instructors expressed conditions under which handicapped students should or should not be included in Title I. Typical responses included: (1) it depended on the severity and/or type of handicap, (2) if handicapped students needed Title I services they should get them, and (3) handicapped students should be included as long as they did not take away all the instructional time from the nonhandicapped students. Conditions under which Title I instructors favored including LEPs in Title I were (1) if the Title I program could provide ESL or bilingual teachers, (2) if special materials could be obtained, and (3) if LEPs spoke English adequately. A few Title I instructors mentioned that they did not have the expertise to instruct LEP or handicapped students.

One plausible reason why regular teachers strongly favored serving handicapped and LEP children in Title I programs is that some regular teachers may have viewed the Title I program as a means of getting extra services for the handicapped and LEP students. Other regular teachers may have viewed the Title I program as a "dumping ground" for LEP students. The Title I

instructors, on the other hand, may have been more hesitant to serve these students if they lacked necessary training and experience in teaching these students.

In summary, the majority of Title I Directors and Principals for whom the question was relevant reported favoring their districts' policies and practices on serving LEP and handicapped students in Title I. Regular classroom teachers more strongly favored serving these students in Title I than did the Title I instructors.

CHAPTER 5.
PROGRAM DESIGN

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

This chapter summarizes data from the District Practices Study pertaining to the program design aspects of Title I projects. For the purpose of this analysis, the program design features of Title I include the grade levels and subject areas served by the program, the intensity of Title I instruction, characteristics of the Title I staff, and the service delivery models used (i.e., inclass vs. pullout design). These aspects of the Title I program as well as local educators' rationales for their program decisions, their perceptions of the problems and benefits of the program design requirements in the 1978 legal framework of the program, and certain cross-time patterns are summarized in this chapter. The following are the specific questions that guided our study of program design and related findings:

- What grades do Title I programs serve?
 - Title I services were concentrated at the elementary level.
 - A much lower percentage of districts serve children in prekindergarten, kindergarten, junior high, and senior high.
 - Thirty-two percent of all districts reported substantial changes in the number of children served at any grade level.
 - At the secondary level, districts tended to add or drop whole grades; at the elementary level, districts tended to increase or decrease the numbers of children served in a particular grade.

- The major reasons for changes in grades served were budget changes, staff recommendations, results of needs assessments and evaluations, and demographic changes.

● What subjects do Title I programs provide?

- Ninety-seven percent of the Title I Directors indicated that reading was the most important component of their programs.
- About two-thirds said that their programs provide mathematics.
- Relatively few districts offered English as a second language, handicapped, or vocational education services.
- Thirty percent of the districts reported significant changes in Title I subjects.
- The main reasons for changes were changes in Title I findings, results of needs assessments and evaluations, staff and parent recommendations, and changes in state mandates.

● How concentrated are Title I services?

- On average, there were 9.8 children in a Title I class and an average pupil-to-instructor ratio of 4.5 to 1.
- The average class period lasted 44 minutes and usually took place during the school day.
- Nearly two-thirds of the Title I districts removed students from regular classrooms to receive instruction.

● What are the characteristics of Title I teachers?

- The average Title I teacher had 5.5 years of experience.
- Title I teachers spent nearly 60 percent of their time working with children; lesson planning, paperwork, and meetings took up most of their remaining time.
- Forty-five percent of the Title I Directors said that there were constraints affecting the quality of Title I staff, including lower pay for Title I

teachers, inability to tenure, Title I teachers, and high turnover.

- Eighty-eight percent of the principals interviewed were satisfied with their Title I teaching staff.

● What changes have occurred in Title I staffing and curriculum approaches since 1978?

- Forty-two percent of the districts made some change in staffing or curriculum.
- Changes in funding levels tended to have more influence on staffing patterns, whereas staff recommendations had more influence on curriculum changes.

● What changes would Title I Directors like to see made in program design?

- Only 28 percent said they wanted to make program design changes.
- The main areas of desired change included grades served, staff composition, and pullout vs. inclass.
- Besides lack of funds, the barriers to change included concerns about compliance, non-Title I and Title I staff opposition, SEA opposition, and LEA opposition.

● Why do districts choose a pullout or inclass program design?

- Over 90 percent of the districts employed a pullout design exclusively or combined pullout and inclass models.
- Thirty percent of the districts reported using inclass designs.
- Large districts were more likely than small or medium-sized districts to employ an inclass model.
- Title I Directors reported that the main reason they used one model over another was they considered the model to be educationally superior.

FEDERAL REGULATIONS FOR TITLE I PROJECT DESIGN

Federal regulations allowed considerable flexibility in the design of Title I projects. They did not specify the grade levels to be served, the subjects to be taught, the time periods in which to deliver project services, or the resources (including the type of staff and materials) to be used. Nor did the statute or regulations prescribe a particular delivery model (e.g., inclass or pullout).

Several features of Title I project design, however, were addressed in the regulations:

- The results of required evaluations of Title I projects were to be used in planning and improving subsequent projects (§200.50).
- The project must be of "sufficient size, scope and quality" (§200.51). That is, the educational objectives of the project must be directly related to the special educational needs of participating children, and plans for the utilization of resources must show reasonable promise of substantial progress toward meeting student needs. In addition, the project must be "concentrated on a sufficiently limited number of services and a sufficiently limited number of children to show reasonable promise of substantial progress" (§200.51 (c)).
- Title I funds must not be used to provide general aid (§200.52).
- Expenditures for a Title I project must involve at least \$2500 of Title I funds (§200.53).
- Educational agencies were encouraged to include program components which would sustain the educational gains of participants. Examples included summer school projects and projects at the junior high, middle school, and secondary school levels (§200.54).
- Educational agencies were encouraged, but not required, to develop an individualized educational plan for each participating child (§200.55).

- The coordination of Title I instructional services with services provided under other programs, including the regular instructional program provided by the LEA, was encouraged (§200.40).

Two personnel requirements were contained in the Federal Title I regulations. First, aides and volunteers who provided Title I services were to have been given training by the educational agency. Second, Title I instructors could be assigned noninstructional duties such as lunchroom and playground supervision under the following conditions:

- These noninstructional duties were limited, rotating, and supervisory.
- Personnel with functions similar to those of the Title I personnel, but who were not paid with Title I funds, were assigned to these noninstructional duties at the same school site.
- These noninstructional duties did not include substitute teaching of a non-Title I class or regular supervision of a homeroom.
- Title I personnel did not perform any duties for pay that non-Title I personnel performed without pay.
- The proportion of total work time that Title I personnel at the same school site spent performing these noninstructional duties did not exceed the lesser of either:
 - The proportion of total work time that non-Title I personnel spent performing these noninstructional duties; or
 - Ten percent of the Title I person's total work time

REPORT OF FINDINGS

Grades Served

Title I services were concentrated at the elementary level. At least 70 percent of all Title I school districts provided

services at each of the grades from one through six (see Figure 5-1). Grades seven and eight were served by approximately half of all Title I districts, whereas grades nine through twelve were served by less than one-fourth of the districts. Twenty-seven percent of all Title I districts provided Title I services at the kindergarten level; only 4 percent provided services at the pre-kindergarten level.

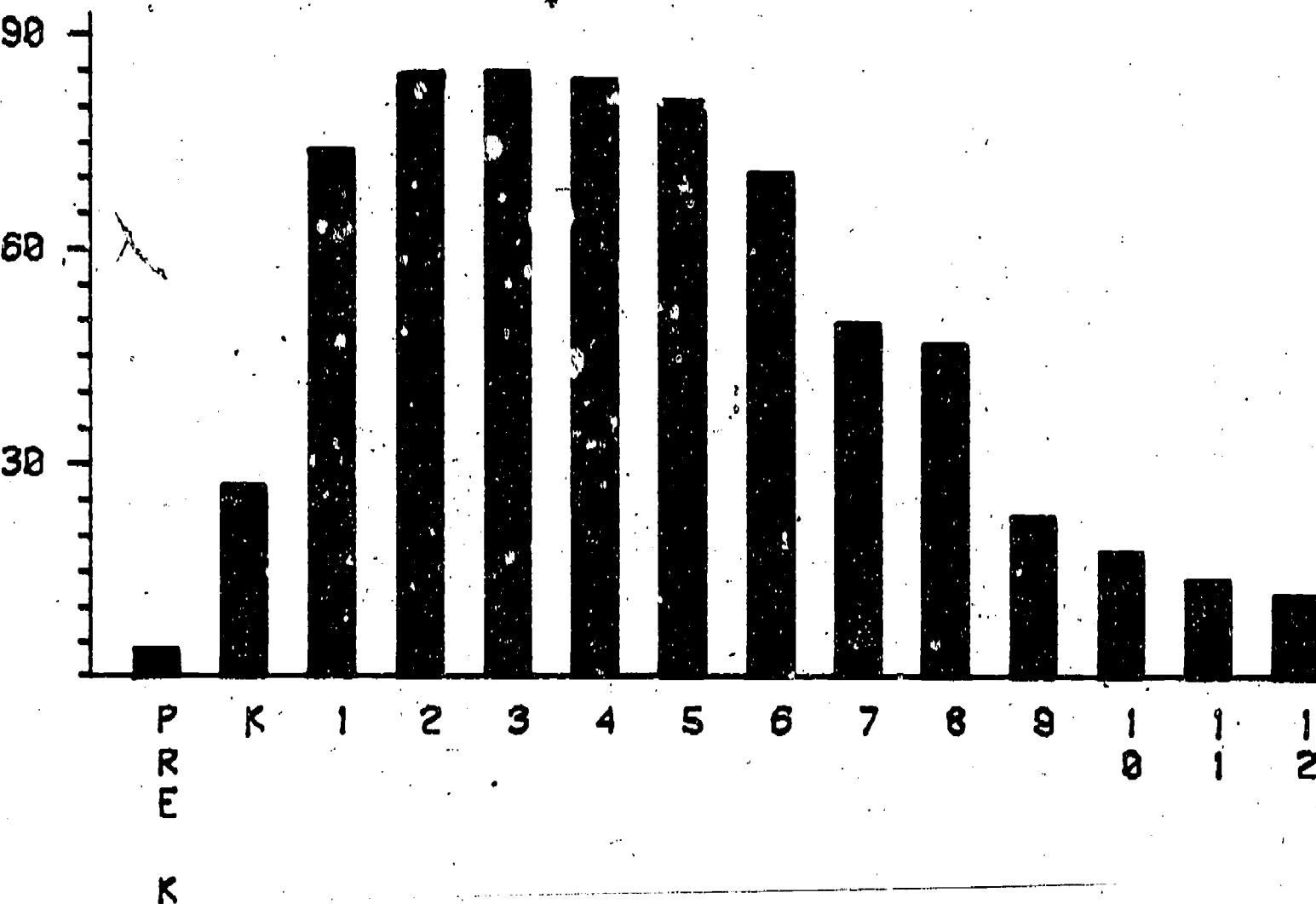
The grades most frequently served in Title I programs were second and third (85 percent of all Title I districts). Beyond grade three, as the grade level increased, the percentage of districts providing services at that level decreased. The decrease was particularly steep between grades six and seven and grades eight and nine, which are often the transition grades from elementary school to junior high and junior high to senior high.

Mail questionnaire districts were asked about changes in grades served since 1978. Thirty-two percent reported a substantial change (10 percent or more) in the number of students served at any grade level. At the secondary level, districts tended to drop or add entire grades, whereas at the elementary level, districts tended to increase or decrease the number of students served in the various grades (see Figure 5-2). In addition, at each of the elementary grades, the percentage of districts increasing the number of students served within a grade or adding a grade was about the same as the percentage of districts decreasing the number of students served or dropping the grade. On the other hand, at the secondary level, the percentage of districts decreasing the number of students served within a grade

FIGURE 5-1

PERCENTAGE OF DISTRICTS SERVING TITLE I
STUDENTS AT EACH GRADE LEVEL
DURING THE 1981-82 SCHOOL YEAR

PERCENT

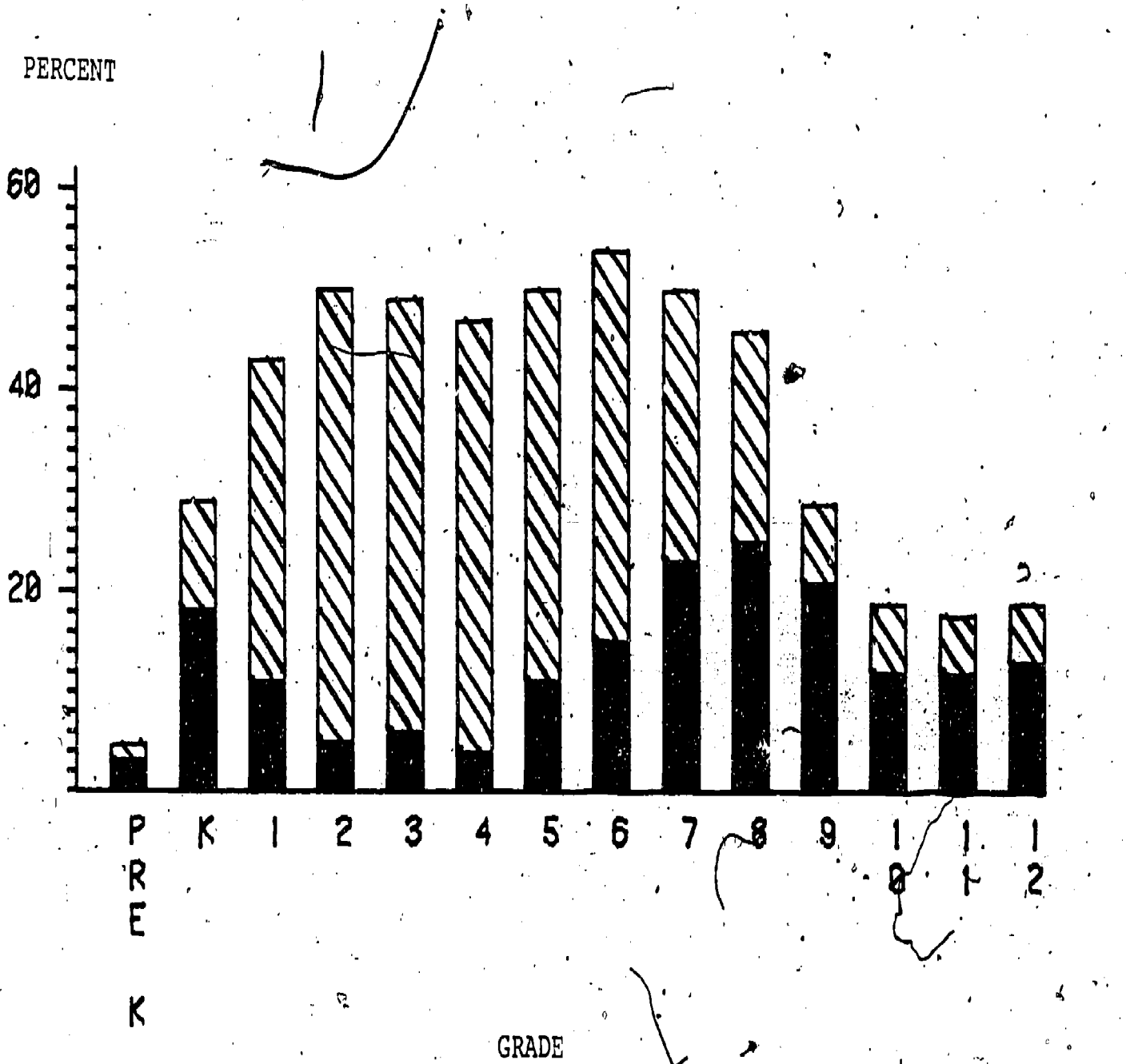


GRADE

N = 1659

FIGURE 5-2

CHANGES IN GRADES SERVED SINCE 1978



LEGEND:

■ GRADE ADDED OR DROPPED

▨ MORE THAN 10% CHANGE NUMBER OF STUDENTS

N = 142

PERCENTAGES ARE BASED ON THE NUMBER OF DISTRICTS SERVED FOR ANY GRADE LEVEL

or dropping a grade was almost twice the percentage of districts increasing the number or adding a grade (see Table 5-1). This pattern of changes in grades served since 1978 provides further evidence of the continued emphasis on the elementary level in Title I programs. Districts generally had elementary Title I programs and may have increased or decreased the number of students served in these grades, but rarely dropped an entire elementary grade. At the secondary level, however, there was a greater tendency to drop grade levels due to budget cuts or other reasons.

Districts gave several reasons for changes in grades served including:

- Changes in Title I funding level (51 percent)
- Teachers' or Principals' recommendations (31 percent)
- Data from formal needs surveys (29 percent)
- Results of formal Title I program evaluations (26 percent)
- Demographic changes (19 percent)*

The provision of Title I services at the various grade levels was related to district size. Generally, the larger the district, the more likely it was that any given grade level was served (see Table 5-2).

*Percentages do not total to 100 percent since more than one response to the question was permitted.

TABLE 5-1

PERCENT OF DISTRICTS THAT MADE CHANGES IN THE NUMBER
OF STUDENTS SERVED SINCE 1978

	<u>Percent of Districts that Added or Increased*</u>	<u>Percent of Districts that Dropped or Decreased*</u>
PK	2	3
K	13	15
1	20	23
2	22	28
3	24	25
4	22	25
5	23	27
6	19	35
7	18	32
8	18	28
9	10	19
10	6	13
11	5	13
12	6	13

*Percentages are based on the number of districts reporting substantial change in number of students served for any grade level. Percentages in these columns do not total to 100 percent since more than one response to the question was permitted.

TABLE 5-2

PERCENT OF SMALL, MEDIUM, LARGE
AND VERY LARGE DISTRICTS SERVING
TITLE I STUDENTS AT EACH GRADE LEVEL
DURING THE 1981-82 SCHOOL YEAR*

	<u>Percent of Small Districts</u>	<u>Percent of Medium Districts</u>	<u>Percent of Large Districts</u>	<u>Percent of Very Large Districts</u>	<u>Total</u>
PK	2	7	15	43	4
K	25	28	42	60	27
1	73	74	79	80	74
2	85	86	88	90	85
3	85	87	89	93	85
4	83	84	87	90	84
5	80	81	85	90	81
6	71	71	76	90	71
7	50	51	54	77	50
8	47	44	51	70	47
9	21	29	34	67	23
10	16	21	27	60	18
11	12	18	20	53	14
12	11	15	18	47	12
	<u>(737)**</u>	<u>(600)</u>	<u>(305)</u>	<u>(17)</u>	<u>(1,659)</u>

*Percentages are computed using the number of districts which actually served students at each grade level.

**Number in parentheses below line in this and all subsequent tables is the number of respondents to this item.

Title I Directors in the representative site visit sample were asked why their districts decided to have Title I services above the elementary grades. In districts with secondary level Title I programs, about one-third (31 percent) said that the decision was based on test results and needs assessments (see Table 5-3). One-fifth of the Directors said it was their desire to serve as many needy students as possible. A similar percentage of Directors (19 percent) said that they had the money available or had always served secondary students. Fifteen percent explained that they wished to provide a continuity of services or that the parents wanted secondary students to be served by Title I (14 percent). Twelve percent of the Directors said that the decision to serve the secondary grades was made because school personnel wanted it or the state Title I office had recommended it.

The most common problem faced by districts offering Title I services at the secondary level concerned scheduling and determining which subjects would be missed given the departmentalized nature of secondary instruction (73 percent). Determining what is supplementary was the problem cited by 42 percent of the districts (see Table 5-4). The third most cited problem was the reluctance of secondary students to participate. Other responses (all less than 12 percent) included concerns over course credits, getting teachers to teach in Title I, securing cooperation from secondary school administrators, and availability of space.

When Title I Directors were asked if these problems were different from those encountered in designing a Title I project

TABLE 5-3

REASONS FOR DECIDING TO PROVIDE
TITLE I SERVICES IN SECONDARY
GRADES REPORTED BY TITLE I DIRECTORS

	<u>Percent*</u>
Formal data (needs assessments, test results)	31
Serve as many students as possible	20
Had available funds	19
Have always served secondary students; decision made long ago	19
To provide continuity of service	15
Parents wanted to serve secondary students	14
School personnel wanted to serve secondary students	12
Emphasis of state Title I office	12
Informal judgment	12
Grade span of schools (e.g., 1-8)	11
Others--e.g., district staff wanted it, institution of minimum competency requirements, school board decision (all less than 9%)	39
	<u> </u> (65)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 5-4

TYPES OF PROBLEMS IN DESIGNING
TITLE I PROJECTS FOR SECONDARY
STUDENTS REPORTED BY TITLE I DIRECTORS

	<u>Percent*</u>
Scheduling, determining which subjects will be missed	73
Determining whether services are supplementary	42
Reluctance of students to participate	22
Convincing teachers to design and teach secondary Title I courses	10
Securing the cooperation of secondary school administrators	7
Others--e.g., other funding not available, availability of space (all less than 3%)	12
	<hr style="width: 100%; border: 0.5px solid black; margin-bottom: 5px;"/> (41)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

for the elementary grades, one-third (33 percent) reported that the problems were different. Fifty-four percent of the Directors for whom the question was appropriate said that scheduling was usually more difficult at the secondary level. Fourteen percent perceived that complying with the issues of supplement-not-supplant and excess costs was more difficult or different than at the elementary level.

Project Directors who did not serve secondary grades were asked why their district decided to have Title I services only in the elementary grades. Almost one-half (46 percent) indicated that limited funds was the major reason for not serving secondary students. Forty percent said that the district believed that early intervention (i.e., serving primary grade students) was more effective, while 14 percent said that the greater need existed at the elementary level. Various reasons given by less than twelve percent of the districts were: a perception of administrative difficulties at the secondary level; state influence led them to restrict services to primary grades; comparability was easier to determine at the elementary level; and students did not readily accept Title I at the secondary level due to perceived stigma.

Data from selected case studies substantiate the mail survey and interview findings regarding reasons why districts decided to provide Title I services in the elementary grades only. For example, one district reported cutting services at the secondary

level based on an anticipated budget cut accompanied by a district salary increase. A different district reported that one of its high schools was no longer eligible for Title I services since new public housing had opened up in another part of the city, thereby rendering the formerly eligible high school ineligible. Another district reported that after it dropped Title I services to secondary schools because of expected budget cuts, it in fact received a larger allocation than expected. However, this district was reluctant to rehire teachers given future Federal funding uncertainties. A fourth district reported dropping Title I services at the secondary level since Title I reading at the high school was an elective subject. District personnel felt that, given its elective status, it did not necessarily serve those in greatest need, but rather was a program for students who still wanted to try to succeed.

Title I Subject Areas

Most local Title I Directors (97 percent) indicated that reading was the most important component of their Title I programs (see Table 5-5). Almost two-thirds of the districts offered mathematics as part of their Title I program and approximately one-third of the districts used program funds for language arts programs. English for students of limited-English background was part of the Title I programs in 11 percent of the districts and a small percentage of districts offered other subject areas such as special education for the handicapped (4 percent*) and vocational education (2 percent).

TABLE 5-5

SUBJECT AREAS EMPHASIZED IN THE TITLE I
PROGRAM DURING 1981-82 SCHOOL YEAR

	<u>Percent*</u>
Reading	97
Mathematics	65
Other language arts	34
English for students of limited- English background	11
Special education for the handicapped	4
Vocational	2
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (1,769)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

Changes in Title I subject areas since 1978 were reported by 30 percent of the districts. More districts added or increased Title I services in the areas of reading, mathematics, other language arts, and English for students of limited-English background than dropped or decreased services in these areas (see Table 5-6). The reverse was true for special education and vocational programs. The most frequent reasons reported by districts for these changes of emphasis in subject areas were:

- Changes in Title I funding level (44 percent of those districts that made changes)
- Data from formal needs surveys (41 percent of those districts that made changes)
- Teachers' or Principals' recommendations (38 percent of those districts that made changes)
- Results of formal Title I program evaluations (27 percent of those districts that made changes)
- Parents' recommendations (26 percent of those districts that made changes)
- New state mandates or emphases (24 percent of those districts that made changes)

Intensity of Title I Instruction

Several quantitative and qualitative factors can affect the concentration or intensity of Title I instructional services, including, for example, class size, the length and frequency of

*Follow-up phone calls were made to all the districts visited that reported having Title I supported programs for the handicapped. In all of these districts, the Title I Directors said that handicapped students were eligible for Title I, but there was no Title I component designed specifically for them. Thus, the actual percentage of districts having a Title I component designed for the handicapped is probably much smaller than the 3.6 percent obtained from the mail questionnaire districts.

TABLE 5-6

PERCENT OF DISTRICTS THAT MADE CHANGES
IN TITLE I SUBJECT AREAS SERVED SINCE 1978

	Percent of Districts that Added or Increased*	Percent of Districts that Dropped or Decreased*
Reading	19	7
Math	55	23
Other language arts	44	19
English for students of limited-English background	45	6
Special education	23	37
Vocational education	0	24

(131)

*Percentages are based on the number of districts that changed emphasis in the particular subject area. Percentages in these columns do not total to 100 percent since more than one response to the question was permitted.

Title I classes, the time and location of instruction, the quality and appropriateness of instructional materials and staff, and the program design model employed (i.e., inclass or pullout).

The average (mean) number of students in a Title I class for public school students was 9.8 compared to 6.4 for nonpublic students with an overall class size average of 9 students. The pupil-to-instructor ratio was quite low for both public (4.5 to 1) and nonpublic (3.8 to 1) Title I classes. These data were calculated from interview data collected from Title I instructors who served students attending public or nonpublic schools.

According to this sample of Title I instructors, an average (mean) Title I class period lasted 44 minutes, with a range of 15 to 300 minutes. This latter situation occurred in replacement-type Title I programs. The modal number of times per week that a student received Title I instruction was five, with public school students spending, on average, 4 hours a week in Title I classes and nonpublic students, 2.63 hours a week.

Most Title I instruction occurred during the normal school day. Ninety-eight percent of the Principals interviewed reported that Title I instruction took place during the school day. Only six percent of the Principals said that some Title I instruction occurred during summer school, and less than four percent reported that Title I instruction occurred before or after the school day.

Almost two-thirds of the Title I districts took students out of the regular classroom to another room in the building for

Title I instruction. At the building level, Principals were asked to estimate the percent of the total number of Title I students served at their schools in various settings. As indicated in Table 5-7, on average, Principals reported that 58 percent of the students received Title I instruction in a separate room in the school (16 percent in a room without special equipment and 42 percent in a room with special equipment). Thirty-seven percent of the Title I students were reported to receive services in the regular classroom. (The topic of inclass vs. pullout design for Title I classes is treated in more detail in the final section of this chapter).

In 22 percent of the Title I districts, however, at least some portion of the nonpublic students received their Title I instruction at a place other than the nonpublic schools they attended during the regular school year. The alternative site was most frequently the public school, often for summer school instruction. In at least four states, however, at least half of the Title I districts served nonpublic Title I students in the public school during the regular school term.

Districts rarely used neutral sites or mobile vans to serve either public or nonpublic Title I students. Nationwide, 4 percent of the districts served some of their nonpublic Title I students at neutral sites, and even fewer districts (2 percent) used mobile vans.

Characteristics and Assessments of Title I Teaching Staff

On average, Title I instructors had 5.5 years teaching experience and taught 71 students per year.

TABLE 5-7

AVERAGE ESTIMATES OF THE PERCENT OF TITLE I STUDENTS SERVED BY LOCATION AS REPORTED BY PRINCIPALS

	<u>Percent</u>
A specially equipped room in the school (e.g., listening center, media lab, learning center)	42
Another room without special equipment	16
Regular classroom that also contains non-Title I students	24
Regular classroom that is composed entirely of Title I students	13
Others--e.g., specially equipped room in another building (all less than 2%)	3
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (280)

Title I instructors were asked to estimate the amount of time they spent on various Title I activities during a typical week. As is shown in Table 5-8, the preponderance of Title I instructor time was spent working with students, 57 percent of their time during a typical week. Title I instructors also spent a substantial amount of time planning lessons (12 percent of their time) and doing paperwork for their own planning (9 percent of their time). Management activities such as completing paperwork for the Title I office in their district, giving tests, meeting with parents and other teachers consumed 19 percent of a Title I instructors time, on average, during a typical week.

During interviews, Title I Directors were asked if there were constraints, other than Title I funding limits, that might affect the quality of the Title I instructional staff. Fifty-five percent said there were no constraints. Among those mentioned by the remaining 45 percent were that the Title I staff was less well paid, Title I teachers could not be tenured, collective bargaining agreements decreased flexibility, Title I was a dumping ground for poorer teachers, seniority system caused some good teachers to be "bumped," late notification of funding level, and high turnover among staff.

Eighty-eight percent of the Principals interviewed were satisfied with the Title I instructional staff. Concerns mentioned by the remaining Principals included the need for better qualified personnel, the need for more personnel, Title I teacher attitude, that the Principal should have more say in the hiring

TABLE 5-8

PERCENT OF TITLE I INSTRUCTOR'S TIME
DEVOTED TO TEACHING AND MANAGEMENT ACTIVITIES
IN A TYPICAL WEEK AS REPORTED BY TITLE I INSTRUCTORS

	<u>Percent of Time Spent on Each Activity During a Typical Week*</u>
Working with students	57
Planning lessons	12
Doing paperwork for teacher's own planning	9
Meeting with classroom teachers	6
Doing paperwork for Title I office	5
Giving tests	4
Meeting with parents	2
Attending inservice programs	2
Meeting with teachers in other special programs	2
Other	1
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (274)

*Percentages derived from reported average (mean) number of hours spent on each activity during a typical week by full-time and part-time Title I instructors.

practice, and that some Principals would like to have other kinds of personnel such as aides or math specialists.

The supervision of Title I instructors was done by the Principal in 51 percent of the schools visited, by the central office in 8 percent, and by both the Principal and the central office in 39 percent of the representative site districts. Most Principals were satisfied with the arrangements for supervision, with only four percent suggesting that there were some problems.

Title I Directors were asked if Title I staff engaged in any noninstructional duties such as hall duty or cafeteria duty. Fifty-one percent responded that noninstructional duties were required throughout the district. The districts which reported that Title I staff were exempt from noninstructional duties (27 percent) were asked if this practice caused friction between Title I staff and the Principal or non-Title I staff. Seventy-three percent said there was no friction, 23 percent said that friction was minor, and only 4 percent said that there was a problem with noninstructional duties.

Almost half the districts (47 percent) had some Title I instructors whose salaries were paid in part with non-Title I funds. These funds were usually from local sources (in 77 percent of the districts with multiple-funded Title I instructors). Forty-six percent of these districts used other categorical funds (e.g., state compensatory education, special education, CETA, Federal migrant education programs) to pay part of the salary for multiple-funded Title I instructors who had responsibilities outside the Title I program.

Staff Development

Title I instructors were asked about the sources of ideas for the Title I program. Sources mentioned most frequently were informal discussions with other Title I instructors (36 percent), formal inservices (27 percent), SEA conferences or workshops (18 percent), district or regional meetings or workshops (13 percent), and resource teachers or consultants (10 percent). Other sources included college courses, regular classroom teachers, the Title I Coordinator, and professional associations.

The mean number of inservice training sessions attended by a Title I instructor during a school year is shown in the following chart:

<u>Type of Inservice</u>	<u>Mean Number of Times Per Year Attended</u>
District level inservice	3.3
School site inservice	2.5
College or university classes	1.3
Workshops conducted outside the district	1.0
Conferences	.9

(274)

Title I Directors interviewed generally considered Title I inservice programs to be valuable for Title I instructors, particularly in familiarizing them with new ideas, materials, technology, and teaching techniques. Several Directors said that inservice training was especially valuable for paraprofessionals.

Nonetheless, in 12 percent of the districts, Title I inservice training was not provided.

Changes in Staffing and/or Curricular Approach.

Since 1978, 42 percent of the districts made changes in the staffing and/or curricular approach of their Title I program.

Reasons given by districts for these changes include:

- Changes in Title I funding level (89 percent)
- Teachers' or Principals' recommendations (72 percent)
- Results of formal Title I program evaluations (65 percent)
- Data from formal needs surveys (60 percent)
- Parents' recommendations (60 percent)
- Informal assessments of program performance (59 percent)

Changes in the Title I funding level tended to result in staffing rather than curricular changes, whereas teachers' or Principals' recommendations and informal assessments of program performance tended to produce curricular rather than staffing changes. Other reasons for changes in staffing and curricular approach had a similar effect on these two aspects of the Title I program.

No discernable patterns were observed in these changes with regard to the use of instructional aides or class size. For instance, sixteen percent of the representative site visit districts reported increasing their use of instructional aides since 1978; however, fifteen percent of the districts indicated a decreased reliance on instructional aides in the Title I program. Similarly, seven percent of the districts lowered the pupil-to-

instructor ratio in the Title I program over this time period and six percent increased this ratio.

Desired Changes in Program Design

Title I Directors were asked if there were any features of their Title I programs that they would want to change if their funding levels remain the same. The 28 percent who desired changes reported that they wanted to alter the following program aspects:

- Grade levels served (45 percent of those desiring changes)
- Staff composition, relative number of teachers, aides, volunteers (40 percent)
- Pullout vs. inclass design (36 percent)
- Use of instructional technology (36 percent)
- Program curricula (26 percent)
- Subject areas covered (25 percent)
- Pupil-to-instructor ratios (25 percent)

Besides lack of funds, districts reported the following barriers to change:

- Concerns about compliance (52 percent)
- School principals and/or other non-Title I staff would be opposed (49 percent)
- Title I staff would be opposed (48 percent)
- State Title I office would be opposed (44 percent)
- District central office would be opposed (37 percent)
- Parents would be opposed (31 percent)
- Employee unions would be opposed (27 percent)

Title I staff opposition was considered to be particularly strong for changes involving program curricula, use of instructional technology, and pullout vs. inclass design. In addition, concerns about compliance and the opposition of state Title I office were especially strong for changes involving the use of pullout vs. inclass design.

Coordination and Comparison of Title I and Regular Instruction

Principals, Title I instructors, and regular classroom teachers in our sample were asked to describe similarities and differences between regular and Title I instruction. A number of respondents said that Title I reinforced regular classroom activities and that the same skills and sequence of skills were provided in both. Title I instruction was said to be more individualized and used a slower, more basic approach.

Only 19 percent of the regular teachers reported any problems in teaching the Title I students or the rest of the class because of the way Title I instruction was arranged. The most frequently mentioned problems were scheduling, helping students make up missed work, students missing classwork, and interruptions in the middle of a lesson for pullout.

Regular classroom teachers were also asked to identify the person or persons responsible for grading Title I students' work. Forty-five percent said that they grade the students with no input from the Title I teacher. Consultation with the Title I teacher is done by 20 percent. Twenty-five percent said that the Title I teacher gives grades, and 17 percent mentioned that Title I teachers sent progress reports.

Regular classroom teachers reported that they met with the Title I teacher to coordinate instruction the following number of times:

<u>Frequency of Meetings</u>	<u>Percent of Regular Teachers*</u>
Daily	24
Once or twice a week	29
Once or twice a month	14
Formally, at least once a grading period	8
Informally, on an as needed basis	18
Infrequently or never	5
Never	9
	(252)

Title I instructors and regular classroom teachers reported similar topics of discussion during these meetings. They included student problems and needs (52 percent of the Title I instructors), student progress (43 percent), instructional techniques (25 percent), and skills needing reinforcement in Title I (20 percent).

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

LOCAL SERVICE DELIVERY MODELS (INCLASS VS. PULLOUT)

Introduction

There is continuing interest in Congress and among local, state, and Federal Title I administrators regarding two popularly labeled compensatory service delivery models--the "inclass" and "pullout" models. Interest, if not controversy, surrounds the use, appropriateness, and relative merits of the pullout and inclass approaches for delivering educational services to Title I students. The District Practices Study's investigation of the inclass vs. pullout issue focused on describing the prevalence of use, changes over time, and district officials' expressed reasons for selecting one or both delivery modes.

The term pullout in this study refers to supplemental Title I or other instruction that is delivered to students outside the regular classroom. Inclass refers to such instruction delivered within the regular classroom. Despite the lack of explicitness of these definitions, district administrators generally had little difficulty applying one or the other terms to the delivery mode of their Title I projects. In general, district administrators considered a replacement-designed Title I class to fall into the pullout classification if the only students served using such a design were Title I students, and inclass if Title I and non-Title I students together received instruction in the same classroom.

Title I statute or regulations never required the use of a pullout or inclass design. However, in the earlier years of the

the program, some states refused to approve inclass programs regarding pullout as the only way to be in compliance (NIE, 1978, p. 170). Congressional interest in not mandating a particular design, however, was reemphasized in Chapter 1 when it stated that use of a pullout design cannot be required to demonstrate compliance with the supplement-not-supplant provisions.

Data from the District Practices Study about local service delivery models for Title I support at least three generalizations: (1) most districts used a pullout design for all or part of their programs, but use of inclass designs was increasing; (2) local administrators reported choosing their program approaches primarily because they believed them to be educationally superior for a particular component of the Title I program; and (3) misconceptions about the supplement-not-supplant provision, found in the past, continued to exist and to influence program design choices in some districts.

District Practices and Reasons for Design Selection

Most districts continued to choose the pullout model rather than the inclass model. Ninety-two percent of the districts surveyed by mail and 96 percent of the Title I Directors interviewed employed a pullout design either exclusively or in combination with the inclass design. In contrast, only 30 percent of the mail survey districts (but 46 percent of the Title I Directors interviewed on site) reported using an inclass approach for part or all of their programs. Fifty-one percent of the representative site districts used a mixture of the inclass and pullout

approaches, 43 percent used a pullout model exclusively, and 6 percent relied exclusively on an inclass design.

District size (as measured by the number of students enrolled) and budget allocations played no major role in the likelihood of a district using the pullout design. However, the use of an inclass design was significantly correlated with the size of the district. For the 30 percent of the mail questionnaire districts that used the inclass design, very large districts (79 percent) and large districts (47 percent) were far more likely to employ the inclass model than small districts (28 percent) and medium size districts (32 percent).

The study was also interested in documenting district administrative rationales for choosing one or more service delivery approach. Ninety percent of the district administrators using a pullout design indicated that they did so because they thought it was educationally superior for part or all of their Title I program. There was no significant variation by district size among districts which said that "educational superiority" was an important reason (see Table 5-9).

Seventy-three percent of the LEAs said that pullouts made it easier to demonstrate compliance with funds allocation requirements. Districts of all sizes cited this reason second most frequently. The third most frequent reason given by districts (87 percent) was that the state Title I office advised the use of the pullout design.

TABLE 5-9

PERCENT OF DISTRICTS INDICATING REASONS FOR USING PULLOUT DESIGN, BY SIZE

Reasons for Use of Pull-out Design	Percent of Small Districts*	Percent of Medium Districts*	Percent of Large Districts*	Percent of Very Large Districts*	Percent of all Districts*
Educationally superior for part or all of our program	92	87	90	88	90
Easier to demonstrate compliance with funds allocation requirements	72	72	77	83	73
State Title I office advice	59	55	55	55	57
Not worth the disruption of changing	42	41	38	43	41
	(521)	(438)	(225)	(20)	(1,204)

*Percentages in these columns do not total to 100 percent since more than one response to the question was permitted.

As reported in Table 5-10, 87 percent of the mail questionnaire districts that used an inclass design as part of their Title I program responded that one reason they did so was because it was considered an educationally superior approach for all or part of their Title I program. Fifty-five percent said that physical facilities for pullouts were not available. Twenty-eight percent indicated that the state Title I office had advised the use of this design.

Since a preponderance of the mail questionnaire districts indicated that sound pedagogy was an important reason for their selection of one or a combination of service delivery models, the case studies were used to examine in more depth the factors districts considered in making these pedagogical decisions. One district that had chosen to implement the inclass model with the use of aides did so because aides were more cost-effective than hiring Title I teachers for a pullout situation. A second district indicated they were motivated to choose the inclass design because it did not require formal teacher coordination meetings. A third district reported that they had selected the pullout design because the regular teachers and the Title I teachers did not work well together in the same classroom. A fourth district decided to adopt the inclass design at the junior high level because junior high students objected to being pulled out and identified. Thus, the broad label of "sound pedagogy" covered a gamut of rationales related to perceived educational effectiveness.

TABLE 5-10

PERCENT OF DISTRICTS INDICATING
REASONS FOR USING INCLASS DESIGN, BY SIZE

<u>Reasons for Use of Inclass Design</u>	<u>Percent of Small Dis- tricts*</u>	<u>Percent of Medium Districts*</u>	<u>Percent of Large Dis- tricts*</u>	<u>Percent of Very Large** Districts*</u>	<u>Percent of all Dis- tricts*</u>
Educationally superior for part or all of our program	87	85	88	83	87
Physical facilities for pullouts are not available	48	57	61	61	55
Not worth the disruption of changing	29	32	25	29	29
State Title I office advice	45	32	38	12	28
	(521)	(438)	(225)	(20)	(1,204)

*Percentages in these columns do not total to 100 percent since more than one response to the question was permitted.

**The number of very large districts responding to this item is very small. Therefore, results in the category should be regarded with caution.

Regardless of a district's reason for selecting a pullout model, such an approach usually necessitated decisions about which subjects or activities students could miss when they were pulled out for Title I instruction. Where such formal policies existed, there was considerable variance in what the policy required. Fifty-eight percent of the Principals reported having a policy on the kinds of regular instruction students could or could not miss when receiving Title I services. Students were not allowed to miss reading in 40 percent of the districts having a policy, they could not miss math in 22 percent of the districts, and they could not miss physical education in 12 percent of the districts. Sixteen percent of the districts reported that students could not miss instruction in any basic subject. Six percent reported that students could only be pulled from subjects not offered by Title I.

Cross-Time Trends In Use of Inclass and Pullout Models

The use of the inclass design is increasing. Of the districts employing this approach, 32 percent increased their use of this design between 1978 and 1981. Only 10 percent decreased their use of the inclass design. Districts reported no comparable net increase for the pullout design (10 percent indicated an increase, while an equal percent report a decrease).

The study also documented districts' reported reasons for either decreasing or increasing their use of the pullout model. Table 5-11 presents the reasons given by Title I Directors for decreasing or increasing their use of pullout from 1978 to 1981.

TABLE 5-11

DISTRICTS' REASONS FOR DECREASING OR
INCREASING USE OF PULLOUT MODEL FROM
1978-81 AS REPORTED BY TITLE I DIRECTORS

<u>Reasons</u>	<u>Percent of Districts Giving Reason for Decreasing Use of Pullout Model</u>	<u>Percent of Districts Giving Reason for Increasing Use of Pullout Model</u>
Teachers' or Principals' recommendations	74	72
Informal assess- ment of program performance	51	59
New district man- dates or educa- tional philosophy	46	41
Parents' recom- mendations	45	57
Results of formal Title I program evaluations	43	63
Data from formal needs surveys	43	56
Changes in Title I funding level	38	56
New state man- dates or emphasis	30	40
Changes in other local programs	30	31
Demographic changes	10	21
	<hr/>	<hr/>
	(184)	(165)

Teacher and Principal recommendations was the most frequently cited reason for decreasing and increasing use of the pullout model. The data indicate that formal evaluation results were more frequently considered an important factor when districts increased their use of the pullout approach than when districts decided to decrease their reliance on this model. Parent recommendations appear to have favored the increase of the pullout approach more frequently or at least their recommendations carried more weight when districts were considering increasing their use of this approach. No significant differences were found among small, medium, and large districts for either decreasing or increasing their reliance on the pullout model.

The study was also interested in determining what, if any, impediments there were to districts changing from one service delivery model to another. Twenty-eight percent of the districts reported their desire to change features of their Title I programs. Thirty-six percent of those districts desiring changes stated that the desired change concerned program design models (pullout vs. inclass). Over a third (35 percent) of these districts indicated that an important reason for not making a change was that they were not sure whether the program would still be in compliance if the change(s) were made.

Other data from the study suggest that misconceptions about Title I's supplement-not-supplant provisions continued to influence program design choices in some districts. During

interviews of Title I Directors, questions were asked about supplanting and excess costs problems. Virtually no Directors described a supplanting problem as a failure to provide Title I students their fair share of state or locally funded services. Over a third of the Directors interviewed perceived supplanting as a problem involving use of Title I funds for ineligible students (a general aid problem, not a supplanting violation).

One Title I Director, for example, discussing a past "supplanting" problem in his district (teachers paid by Title I who instructed non-Title I students) said he solved the problem by switching the program from an inclass to a pullout design. Similarly, another Title I Director made the mistake of thinking his district "avoided all supplanting problems by making sure only Title I students received Title I services."

This confusion of general aid violations with supplanting problems does not in itself establish that many school districts misunderstood the true implications of supplement-not-supplant for design of Title I programs, but two such examples among the Title I Directors interviewed may confirm just such a hypothesis.

One Title I Director in a large urban district showed DPS staff an accurate and insightful memorandum prepared on the implications of the supplanting requirement for Title I program design. He said the memorandum was written after lengthy reflection and detailed conversations with ED officials. The memorandum contained a description of several alternatives to the pull-out approach.

Another Title I Director reported a similar experience. After many hours of analyzing the excess costs models set forth in ED Title I guidelines, this Director applied the pertinent principles to the fiscal circumstances of his district and developed a detailed resource distribution formula to ensure that each Title I student would receive a fair share of state and local services. This district eventually developed a detailed plan which used the excess costs principles to develop an inclass Title I replacement project.

District Practices Study staff found no comparable documents in other districts, and both of these exceptional Directors stated that their work led them to a new understanding of the meaning of the excess costs and supplement-not-supplant provisions for the design of Title I programs.

SUMMARY

While the use of the inclass model increased slightly between 1978 and 1981, most districts continued to use the pull-out model for part or all of their Title I projects. Local administrators frequently reported that they selected their present delivery model or mix of delivery models because of their belief that the approach was educationally superior for their particular district or for particular schools. District size is strongly correlated with whether a district used an inclass model for all or part of its Title I program, with large districts far more likely to have employed this model than small and medium districts.

Over two-thirds of the districts using a pullout model believed this approach made it easier to demonstrate compliance with Title I's funds allocation requirements. District officials expressing a preference for changing their service delivery model frequently cited uncertainty about the legality of alternatives being considered as a reason for not adopting the change. On the other hand, the study's case study data suggest that misconception about the interrelatedness of Title I's supplement-not-supplant and program design decisions persisted for many local Title I Directors.

CHAPTER 6

PARENTAL INVOLVEMENT IN TITLE I: PRESENT PRACTICE AND FUTURE OUTLOOK

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

The District Practices Study focused on the management activities of districts implementing Title I programs. Establishing and managing parent advisory councils at the district and, in most instances, at the school or attendance area levels was a requirement of the Title I legislation. The specific questions that guided our inquiry in this area and the related findings are highlighted below.

- What proportion of districts had functioning councils, as required by the legislation?
 - Ninety-four percent of the districts had a district-level council that had met at least once during the school year.
 - Eighty-nine percent of the districts with district-level councils reported that all Title I schools had school-level councils.
- To what extent did district-level councils advise project managers about the planning, implementation, and evaluation of Title I programs, as mandated in the legislation?
 - While 81 percent of these councils advised about at least one of these areas, 19 percent had no input into program design, 30 percent had no input into implementation, and 24 percent had no input into evaluation.
 - The district-level councils for smaller districts (enrollment less than 2,500 students) had less input into these areas. Correspondingly, 44 percent of these small districts reported four or fewer district-level advisory council meetings during the year. Only 8 percent of large districts (enrollment of 10,000 or more) reported that their councils met this infrequently.

• What did Directors of Title I projects perceive to be the relative burden and necessity of the legislative requirements regarding parental involvement?

- Parental involvement was ranked as the most burdensome of the legislative requirements. It was seen as only of modest necessity for the attainment of program objectives.
- For each Director who called the parental involvement requirement one of the best features of Title I, three called it one of the worst.

• What were the problems with the parental involvement requirement that made it so burdensome?

- While organizing and meeting with parent groups did not take a great deal of time, there were problems and frustrations in meeting the letter and spirit of the requirements. Only 15 percent of the Directors reported no problems with their district-level council, and less than half that number reported no problems with their school-level councils.
- Obtaining members and getting them to attend were the greatest problems. Getting the members who attended the meetings to participate was reported to be less of a problem, but it still affected nearly half of all district and school-level councils.
- The larger the district, the less likely the Director was to have trouble with the district-level council, but the more likely he was to have problems with the school-level councils.

• Given the elimination of the requirement for parent advisory councils under Chapter 1 of ECIA, what did Title I Directors report would become of them?

- Just under one-fourth of the Directors felt that the district-level and school-level councils would continue to operate as they had before.
- Directors from larger districts were more likely to expect that the district-level council would continue, but that the school-level councils would be reduced or eliminated.
- Directors from smaller districts were more likely to expect that both types of advisory council would be eliminated.

INTRODUCTION

This chapter presents a brief history of the legislative mandate for parental involvement in local Title I projects, a synopsis of previous studies on this topic, an examination of the data collected in the Title I District Practices Study, and a summary of what local Title I officials believed to be the future of parental involvement under Chapter 1 of ECIA.

HISTORY OF THE MANDATE FOR PARENTAL INVOLVEMENT

The original legislation for Title I (P.L. 89-10) in 1965 required that parents be involved in developing district level applications. Subsequent regulations and guidelines sought to clarify this requirement. In July 1968, district-level advisory councils were suggested; in November 1968, "maximum practical involvement" of parents in all phases of Title I was required. In 1971 LEAs were required to provide parents with documents on planning, operating, and evaluating projects. In 1970 a Parent Advisory Council was required at the district level; in 1974 the law was changed to require councils at the school level as well, with members of all councils to be selected by parents. The districts examined in the District Practices Study were operating under legislation enacted in 1978 (P.L. 95-561) that described the establishment of councils in detail and stated the broad areas of their responsibility and the support to be provided to them from Federal, state, and local sources. Some specifics of this legislation will be presented as background for understanding the subsequent analyses of the data.

Establishment of Parent Advisory Councils

Title I legislation in 1978 mandated that each school district receiving Title I funds have a district-level advisory council. The majority of members were to be parents of children served by Title I projects. Representatives of children and schools eligible for Title I services, but not currently participating, were to be included on the council. The members had to be elected by the parents in each district. This could be accomplished by a general election or by allowing the school-level councils to elect the DAC members.

Each project area or school was also required to have a council unless fewer than 40 students participated and no more than one FTE staff member was paid by Title I. The majority of each council had to be parents of children served by Title I, elected by the parents in that project area or school. If the area or school had 75 or more served students, then the council had to have at least 8 members. Members were expected to serve two-year terms and were eligible for re-election. Officers of these councils were expected to be elected after the council was fully constituted, and the council was to meet "a sufficient number of times per year," on a schedule and at locations determined by the council itself. If parents desired to have teachers in project schools serve on the councils, they were to be elected also. There were no restrictions placed on the area of residence of the teachers.

The legislation specified that ". . . each local educational agency shall give each advisory council which it establishes

. . . responsibility for advising it in planning for and implementation and evaluation of, its programs and projects assisted under this title" (§ 125(b), P.L. 95-561).

Support for Parent Advisory Councils

The 1978 legislation mandated that all members of advisory councils receive a copy of the Title I legislation, Federal and state regulations, and guidelines for the program. Also, each SEA was supposed to give each District Advisory Council a copy of any report of state or Federal auditing, monitoring, or evaluation activities in that district. Each LEA was to prescribe a program of training for all members of all its councils "to carry out their responsibilities." This training program was to be planned "in full consultation" with the council members. Moreover, the Secretary was to sponsor regional workshops to assist LEAs "to work with and provide training to Parent Advisory Councils," and "to facilitate parental involvement in the programs conducted under this title." Finally, the Secretary was required to prepare a policy manual to "assist advisory councils . . . in advising the local educational agencies in the planning for, and implementation and evaluation of, programs and projects under this title."

PREVIOUS RESEARCH ON PARENTAL INVOLVEMENT IN TITLE I

The synopsis of previous research presented in this section will concentrate on parental involvement via the advisory councils. The first three studies to be summarized were conducted prior to the enactment of the Education Amendments of 1978.

As a part of System Development Corporation's [SDC] Sustaining Effects Study, 15,000 parents were interviewed in 1977. Few of these parents were aware of the schools' Parent Advisory Council, few reported voting in PAC elections, and few said that they were or had been PAC members (Hinkley, 1979; Wang, 1978).

The National Institute of Education (1978) reported that Principals often dominated School Advisory Councils, most council members were appointed rather than elected, few districts offered training to council members, and councils were seldom involved in planning or evaluating projects. NIE concluded that there was no clear Federal policy on parental involvement, and that lack of this created considerable confusion about the role of the councils and led to a great deal of variety in their operations.

CPI Associates (1979) assessed the impact of councils on Title I projects, and concluded that district-level councils had moderate impact, while school-level councils had little impact. They also found that councils had the greatest impact when the LEA staff sought their support for a change in the program. Councils that attempted to obtain changes on their own had little impact.

The major study of parental involvement in Title I to date was conducted by SDC (1979-81) after the enactment of the new legislation in 1978, but before the regulations corresponding to this legislation were promulgated. SDC found that in 1979:

District-level Councils [DACs]

- Nearly 100 percent of the districts served by Title I had a district-level council.

- Ninety-five percent of the districts served by Title I had councils on which parents of served children were the majority of voting members.
- The Parent Advisory Council [PAC] chairperson or another PAC member presided over district-level council meetings in 57 percent of the districts, but they set the agenda by themselves in only 17 percent of the districts, sharing this duty with the project Director or Parent Coordinator in 49 percent of the districts.
- Ninety-seven percent of the district-level committees participated in evaluation, 60 percent reviewed or signed off on all or part of the budget, and 30 percent had input into staff selection or evaluation.
- Twenty percent of the district-level councils had a budget they could use at their own discretion.

School-level Councils [SACs]

- Fifty-seven percent of schools with 75 or more served students had councils composed of 7 or fewer members. (Three percent had no council.)
- In 10 percent of the school councils, parents of served students were not a majority of the voting membership.
- In 45 percent of the school councils, parents of served children were elected to membership.
- In 56 percent of the school councils, the meetings were conducted by the SAC chairperson or another SAC officer, but only in 24 percent did they set the agenda. Agenda setting was shared with project staff in 45 percent of the schools.
- The participation level of school councils in such activities as project application, budget reviews, and personnel selection and evaluation was slightly less than for district councils. More school councils advised on evaluation, however.
- About 12 percent of school councils had a budget they could spend at their own discretion.

The findings from SDC's in-depth studies (1981) indicated that there was probably not much substance to the level of involvement called "advisement" in SDC's survey. If the survey

data are re-computed by classifying the "advisory level as equivalent to having little or no involvement. Survey indicated that only about 30 percent of the council (either level) had any shared or exclusive decision-making responsibilities with respect to project applications and evaluations; only 20 percent exercised this level of input, in budget sign-off; and less than 5 percent exercised this level of authority in personnel matters.

Although the 1978 legislation for Title I clarified the rules governing the composition and formation of advisory councils, it (perhaps intentionally) left vague the nature of the role of these councils. SDC found generally high levels of compliance with rules governing the formation and composition of district-level councils, and somewhat less compliance regarding school-level councils. However, few districts actually received or attended to advisement from their councils. On the other hand, a small proportion allowed these councils to exercise great authority over the nature of the Title I project.

ISSUES ADDRESSED IN THE DISTRICT PRACTICES STUDY

The SDC study provided a comprehensive description of the composition and functioning of Parent Advisory Councils at the district and school levels. However, that study was focused on the ways in which parents could influence programs and projects and the ways in which districts could foster involvement of greater numbers of parents. The DPS focused on the management activities of districts implementing Title I programs. It asked

respondents to reflect on the necessity for certain activities and the burdens that such activities placed on the staff responsible for implementing the programs.

This section will present some descriptive data about the existence and functioning of councils, and compare these figures to those reported by SDC. However, the main focus will be on:

- The areas in which PACs contributed to projects
- The perceived necessity of parental involvement
- The perceived burden of complying with parental involvement requirements
- The anticipated and desired changes under ECIA, Chapter 1

The data for this section are drawn from the mail questionnaire, structured interviews with district staff and some parents in a representative sample of 100 districts, and reports of in-depth case studies in 40 districts. The case studies were not focused on parental involvement; however, there were a number of places where information about the involvement of parents, particularly through PACs, was obtained. A careful examination revealed that high levels of parental involvement through PACs was not prevalent in the case study districts.

Establishment of Advisory Councils

Ninety-four percent of the districts had a district-level advisory council that had met during the 1980-81 school year. This figure is lower than the SDC figure because SDC's survey did not specify that the council had to have met during the year in order to be counted. Among these districts, 89 percent reported

that all schools receiving Title I services had a school-level advisory council in 1980-81. Among the 11 percent of districts that had some schools without SACs, the average number of served schools that did not have councils was 3.2. SDC's evidence of higher compliance with the regulation concerning the establishment of school-level councils is probably related to the exclusion of schools having fewer than 40 served students in their estimates. Smaller districts held fewer DAC meetings than larger districts and involved their parents for less time, as shown in Table 6-1.

Advisory Council Contributions to Projects

The data in Table 6-2 show that Title I Directors indicated that most DACs made recommendations about planning, implementing, and evaluating the Title I program. However, councils infrequently initiated action in these mandated areas of involvement. Indeed, Title I Directors indicated that 19 percent of the DACs had no input into program design, 30 percent had no input into implementation, and 24 percent had no input into evaluation.

There was a tendency for smaller districts to have no involvement more often than larger districts, as shown in Table 6-3. This is, of course, consistent with the time commitment and frequency of meeting data presented in Table 6-1.

The data in Table 6-2 concerning council input into their own role or function and into other types of parental involvement are consistent with the SDC findings. There generally was more council-initiated (meaning the parents on the council) activity

TABLE 6-1

FREQUENCIES OF DAC MEETINGS AND TIME OF
DAC MEMBERS DEVOTED TO PARENTAL INVOLVEMENT IN TITLE I

	<u>District Size*</u>			
	<u>Small</u>	<u>Medium</u>	<u>Large</u>	<u>Certainty</u>
Percent of districts holding fewer than four DAC meetings in 1980-81**	44	34	10	0.4
	<u>(181)***</u>	<u>(151)</u>	<u>(80)</u>	<u>(8)</u>
Hours DAC members spent on parental involvement in a typical month in Title I****	5.6	4.7	8.6	25.7
	<u>(21)</u>	<u>(29)</u>	<u>(9)</u>	<u>(23)</u>

*Certainty districts are those with total enrollments greater than 50,000 students and are among the 60 largest districts in the country; large districts have enrollments of at least 10,000; medium districts have between 2,500 and 9,999 students; and small districts have less than 2,500 students.

**Mail survey data.

***Number in parentheses below line in this and all subsequent tables is the number of respondents to this item.

****Representative site visit data--DAC Member interviews.

TABLE 6-2.

PARTICIPATION OF DISTRICT ADVISORY COUNCILS
IN VARIOUS AREAS OF PROJECT MANAGEMENT

<u>Features of the Title I Instructional Program</u>	<u>Percent Initiated Action*</u>	<u>Percent Made Recom- mendations*</u>
Provided input into the design of the 1981-82 Title I program	8	73**
Helped establish last year's Title I program	6	64
Assisted in assessing last year's Title I program	9	67
<u>Role or Function of Councils</u>		
Expanded or contracted the council's responsibilities	13	36
Involved itself in election procedures	25	41
Involved itself in planning for training of council members	19	40
Involved itself in obtaining information pertinent to council business	24	38
<u>Other Types of Parent Involvement</u>		
Helped plan or establish workshops for parents	22	33
Encouraged parents to work as volunteers in classroom	18	31
Encouraged parents to work as volunteers for nonclassroom activities	16	24
Encouraged parents to help children with homework for school-related work in the home	23	43
Other	5	8
	(424)	(424)

*Percentages in these columns do not total to 100 percent since more than one response to the question was permitted.

TABLE 6-3

PERCENT OF DACs FROM DISTRICTS OF DIFFERENT SIZES
 REPORTED AS HAVING NO INVOLVEMENT IN THE
 MANDATED AREAS OF PARENTAL INVOLVEMENT

	<u>District Size</u>		
	<u>Small</u>	<u>Medium</u>	<u>Large and Certainty</u>
Program Design	24	10	13
Implementation	34	22	23
Evaluation	27	21	19
	<u>(190)</u>	<u>(152)</u>	<u>(87)</u>

in these areas. In many districts, SDC found both parents and district officers in accord that these areas were more appropriate for parent input than the technical areas of planning, budgeting, implementing, and evaluating Title I programs.

In the mail survey, Title I Directors were asked whether they had changed either the grades served or the subject matter areas in which Title I provided supplementary services. About 30 percent said they had. These Directors were asked to rank the influence of parents on these changes. Parental input was ranked as least important regarding grades to be served, falling well behind changes in funding levels, staff recommendations, needs surveys, and program evaluations. Changes in funding level, staff recommendations, and needs surveys again outweighed parental input in the choice of subject matter for Title I services, while program evaluations, state mandates, and shifts in district approach were given about the same weight.

In the mail survey, Directors were also asked if they would like to change any feature of their program, holding funding constant. The twenty-eight percent who said they would were asked to rate several potential barriers to these changes. Table 6-4 shows that parental opposition was less likely to be considered a barrier than all other sources but unions. For every Director stating that parental opposition would be very important, there were more than five stating that it would not be important.

Parental Involvement: Burden vs. Necessity

In the mail survey, more than half of the Title I Directors reported that they spent less than 25 percent of their time

TABLE 6-4

DIRECTORS' RATINGS OF VARIOUS POTENTIAL
IMPEDIMENTS TO CHANGES IN PROJECT ACTIVITIES

	<u>Percent Very Important</u>	<u>Percent Somewhat Important</u>	<u>Percent Not Important</u>
We are not sure whether the program would still be in compliance if the change(s) were made	40	12	48*
State Title I office would be opposed	30	15	55
Title I staff would be opposed	20	30	51
District central office would be opposed	18	20	62
School principals and/or other non-Title I staff would be opposed	14	35	51
Parents would be opposed	13	18	69
Employee unions would be opposed	11	16	73

*Rows total to 100 percent, except for rounding errors.

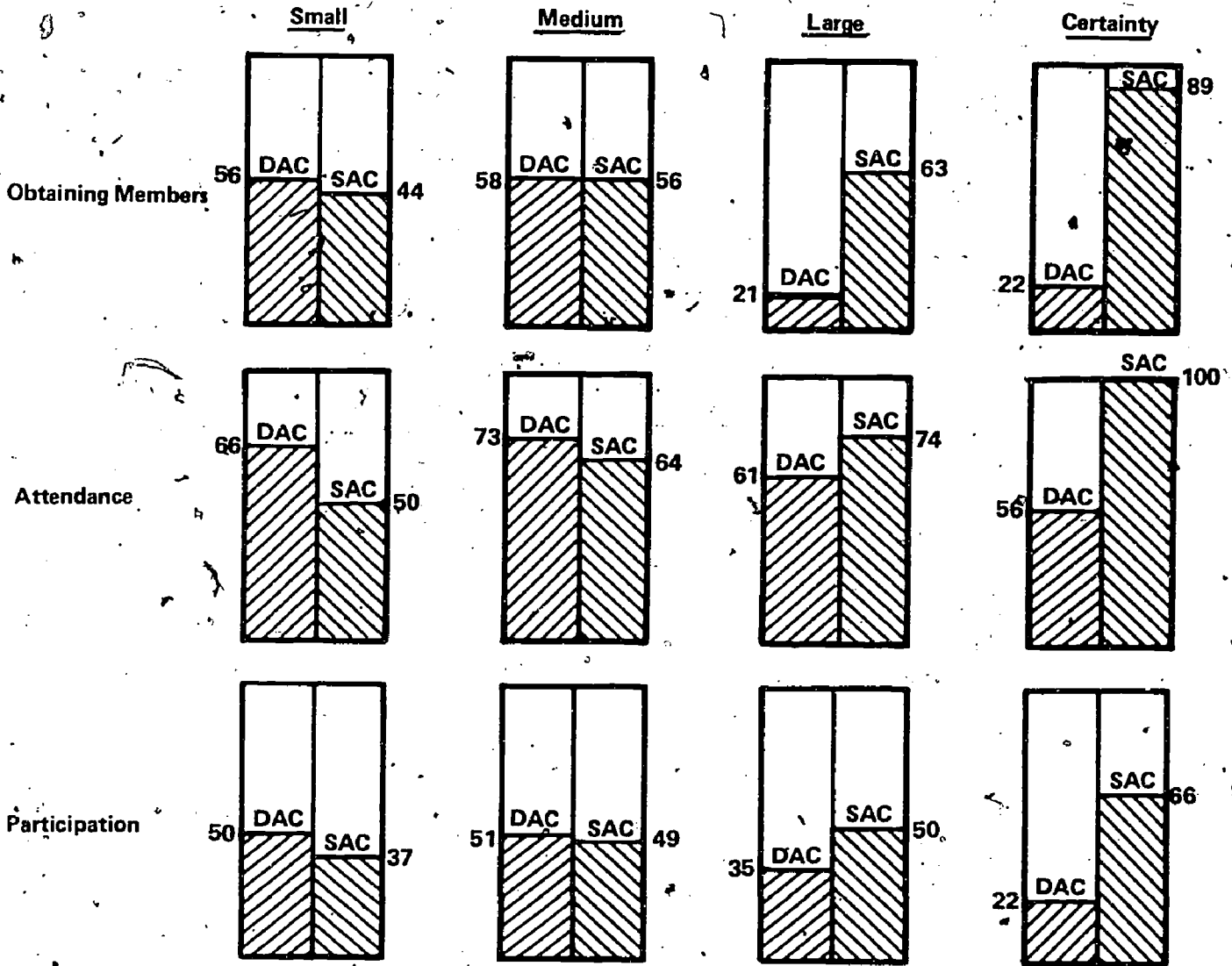
administering Title I. They were also responsible for other programs and projects in the district. These Directors indicated that organizing and meeting with parent groups occupied only 10 percent of the time they spent in the administration of Title I. Thus, the total time devoted to parental involvement does not indicate that this would be an excessive burden on project management. However, parental involvement was often reported to be the most burdensome feature of Title I. Furthermore, when asked to name the best and worst features of the current Title I legislation, three respondents called parental involvement one of the worst features for everyone who called it one of the best.

Although the amount of time spent on parent involvement does not seem to be burdensome, there were problems and frustrations in meeting the letter and the spirit of the requirements for elected councils of specified size. Only 15 percent of the Title I Directors responding to the mail survey reported that there were no problems with the DACs, and even fewer (7 percent) reported no problems with the SACs. The survey asked about three possible problems (obtaining members, getting members to attend meetings, and getting members to participate at the meetings they attended). Each of these seemed to plague Title I Directors to varying degrees, depending upon the size of the district, as shown in Figure 6-1. SACs were more troublesome the larger the district, while DACs were less troublesome. This may be related to the finding that members of DACs in larger districts had longer terms of service on the council and had more training.

FIGURE 6-1

PROBLEMS WITH DAC AND SAC MEMBERSHIP,
ATTENDANCE, AND PARTICIPATION, BY DISTRICT SIZE

DISTRICT SIZE



The figures represent the percentage of the Title I Directors in each size group reporting that a particular problem had characterized the DAC or SACs.

SAC members served shorter terms and were less well trained, overall. Table 6-5 summarizes these data.

Members of DACs and SACs were interviewed about the same potential problems. They tended to report slightly lower incidences of problems, especially viewing attendance and participation as less troublesome, than did the surveyed Directors. Overall, 33 percent of DAC members reported no problems, while only 10 percent of SAC members reported no problems.

When asked about specific causes of these problems, the DAC and SAC members cited many reasons, but few with enough frequency to firmly establish them as preeminent causes. The most often cited reasons were:

- Working parents have little time (25 percent)
- Parents lack interest or feel meetings are a waste of time (13 percent)
- Parents lack specific knowledge needed to perform their duties (16 percent)
- Parents of students in private schools or parents of limited-English-proficient [LEP] students are sources of these problems (6 percent)

CHANGES THAT MIGHT OCCUR UNDER ECIA

Section 556(b) of Chapter 1, ECIA (P.L. 97-35) describes the assurances that districts must provide to the state in applying for Chapter 1 funds. It stipulates that Chapter 1 programs and projects must be "designed and implemented in consultation with parents and teachers" of the children being served. Grantees are not required to establish Parent Advisory Councils. However, the conference report accompanying P.L. 97-35 states that "it is an

TABLE 6-5

YEARS OF SERVICE OF DAC AND SAC MEMBERS AND
HOURS OF TRAINING PROVIDED TO COUNCIL MEMBERS

	<u>District Size</u>			
	<u>Small</u>	<u>Medium</u>	<u>Large</u>	<u>Certainty</u>
<u>Years of Service on Council</u>				
DAC	1.8	2.4	2.8	4.7
SAC	2.3	1.6	2.6	3.0
<u>Hours of Training in Last Year</u>				
DAC	2.9	2.9	6.8	30.0
SAC	2.3	0.6	1.8	12.8

option of the local educational agencies to continue using PACs to comply with the consultation requirement" (p. 748). It may also be worth noting that parents are now to be consulted on design and implementation issues, where before, they were to advise on planning, implementation, and evaluation questions.

Because at the time of our survey the legislation was very new, only 14 percent of the mail questionnaire respondents said they could respond to a general question about the strengths and weaknesses of ECIA. Nineteen percent of these thought elimination of required councils was a strength, while 14 percent thought it was a weakness. Given specific information about the ECIA requirements, about 75 percent responded to particular hypothetical outcomes by choosing the one they would prefer and the one they anticipated would occur; these responses are presented in Figure 6-2.

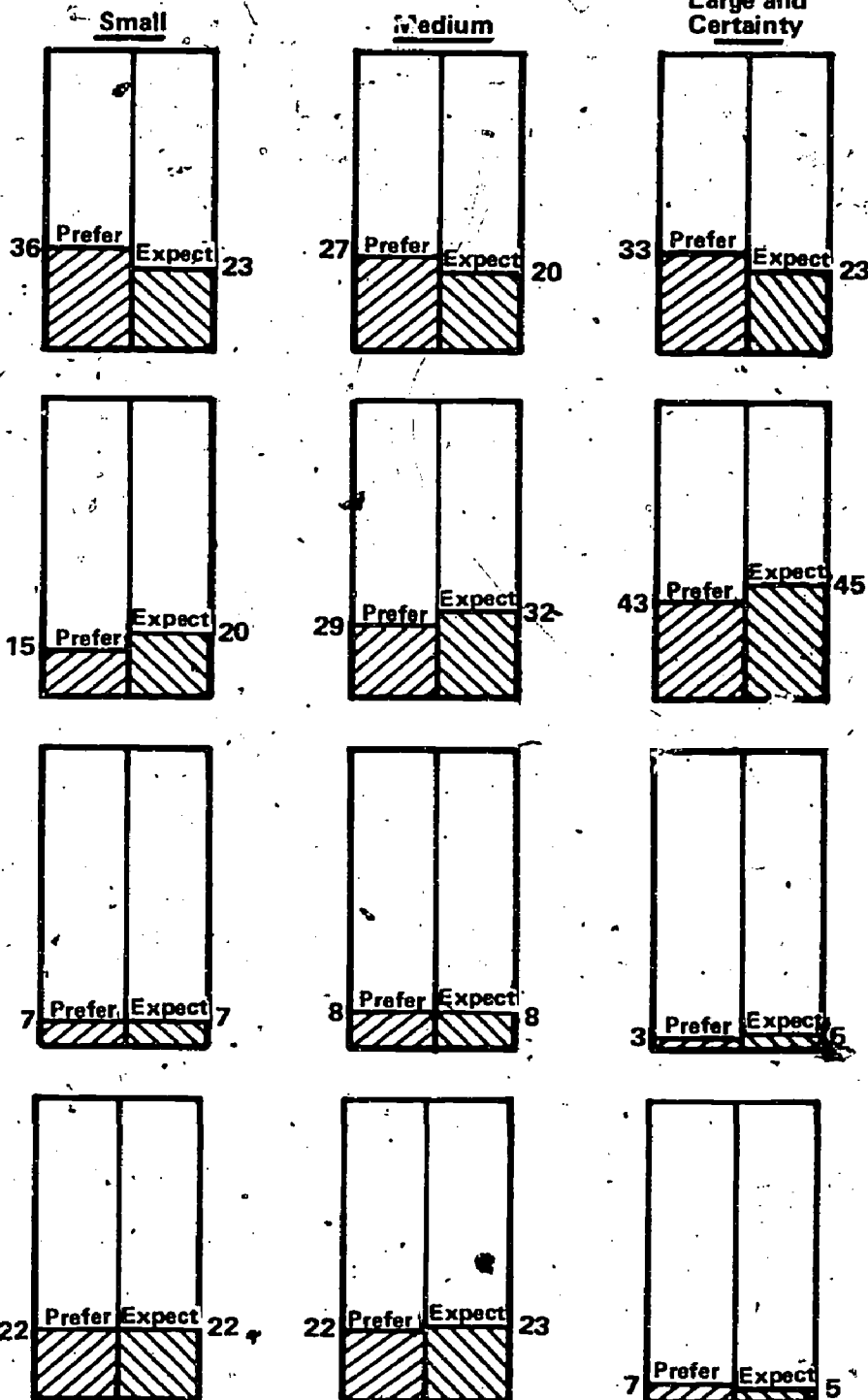
The interviews conducted with Title I Directors confirmed these trends, as shown in Table 6-6. The DAC was regarded as unlikely to change in most larger districts (65 percent), while some smaller districts reported that they may eliminate all councils (42 percent).

When we tried to determine whether there was a relationship between the problems with councils cited earlier and the desire to retain or eliminate them, we found that the data were inconclusive. Very few Directors reported no problems, and they seemed to choose retention or elimination in about the same proportions as Directors who reported problems. Thus, we cannot

FIGURE 6-2

PREFERRED AND ANTICIPATED CHANGES TO DACS AND SACs AS A CONSEQUENCE OF ECIA

DISTRICT SIZE



All councils will continue operating as they are this year.

The DAC will be basically unchanged, but SACs will be substantially reduced or eliminated.

The DAC will be substantially reduced or eliminated, while SACs remain basically unchanged.

Both the DAC and the SACs will be effectively eliminated.

The figures represent the percentage of Title I Directors reporting their preference or expected change.

TABLE 6-6

ANTICIPATED CHANGES TO DACs AND SACs
AS A CONSEQUENCE OF ECIA*

	<u>District Size</u>		
	<u>Percent Small</u>	<u>Percent Medium</u>	<u>Percent Large and Certainty</u>
All councils will continue operating as they have this year.	26	21	34
The DAC will be basically unchanged, but SACs will be substantially reduced or eliminated.	3	21	31
The DAC will be substantially reduced or eliminated while SACs remain basically unchanged.	0	9	6
Both the DAC and the SAC will be eliminated.	42	29	12
	<u> </u>	<u> </u>	<u> </u>
	(31)	(34)	(32)

*Table entries are the percentages of Directors in each column. (size category) giving the indicated response. Responses were coded from answers to a broad question concerning the Director's "best guess" as to the future of the councils.

formally confirm that problems with SACs reported by larger districts are leading them to want to reduce or eliminate these councils.

When we asked why they chose as they did, the respondents favoring elimination of councils reiterated the burden of requirements for elections and for having a certain number of members. Apparently, Directors would have preferred smaller councils than were prescribed under Title I and would have preferred to appoint members rather than hold elections.

Some contrasting quotes capture the flavor of the extreme positions with respect to parental involvement:

WANTING ONE REQUIRED PAC

Parents are valuable as advocates for the program.

There should be a requirement that goes beyond "consultation." Schools don't exist in a vacuum; they have to have an effective relationship with their clients.

Parents bring an accountability to the program that is basic.

The option may create pressure to increase the number of groups to represent each parent faction.

WANTING TOTAL LOCAL OPTION

Parents don't want to be bothered.

Title I requirements are too time-consuming for parents to commit themselves to DAC participation.

Professional educators need to make the decisions. Educators do all the work anyway, so why bother?

PACs are a thorn in the side due to political activism and demands for services.

ECIA represents a departure from previous legislation regarding parental involvement in Title I. The scope of federally required involvement has been reduced and the mandate for a particular vehicle for involvement, the advisory councils,

has been eliminated. A sizable fraction (19 percent) of the surveyed districts anticipated that their councils will disappear. Although other districts reported that they want to keep parent advisory groups, they will probably be formed in ways different from the Title I legislative prescription. A confounding factor is that certain states mandate advisory groups for schools receiving various types of supplementary funding.

It will be of interest to note:

- Whether more states begin to mandate advisory councils (so that they can be assured that the projects are run in consultation with parents of served children)
- Whether, in the absence of state requirements, districts choose to maintain a council or councils; whether they are composed of elected or appointed members; and whether parents of served children are the majority of membership
- Whether, because of state requirements or district interest, the councils that are retained have greater or lesser involvement

The requirements for parental involvement in Federal programs were designed to insure that parents of the children to be served participated in the planning and implementation of local projects. The Federal government is devolving the authority for the design and operation of educational programs to the states, and removing "unnecessary Federal supervision, direction, and control. . . (and) . . . burdens which. . . make no contribution to the instructional program." This move towards local control may be offset by the concurrent weakening of specific provisions for the involvement of members of the groups to be served. On the other hand, removing the prescription for the advisory

councils may offer local administrators the opportunity to involve members of such groups in more creative ways.

Although districts generally complied successfully with the Title I requirements to establish councils, parents did not seem to become deeply involved in planning, implementing, or evaluating Title I programs in most districts. It remains a question whether eliminating the requirement for councils will reduce or enhance the quality of parental involvement in these activities.

CHAPTER 7

FUNDS ALLOCATION REQUIREMENTS

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

- Did districts have difficulty with the maintenance of effort standard?
 - Very few Title I districts (6 percent) reported having difficulty meeting Title I standards for maintaining state and local effort, and very few Title I Directors reported that maintenance of effort was a major issue in their districts.
 - Of those districts that had difficulty with maintenance of effort, only 9 percent had their Title I funds reduced because of the problem and no districts lost their funds for the entire year.
- Did districts have difficulty obtaining waivers from the requirement?
 - Of the one-third that sought a waiver of the maintenance of effort standard, all received a waiver.
- What effect did Title I Directors perceive the 10 percent "slippage factor" in the new ECIA maintenance of effort requirement will have?
 - Forty-eight percent of the Title I Directors reported that the new 10 percent "slippage factor" in the ECIA maintenance of effort provision would help given probable decreases in state and local resources. However, 34 percent of the Title I Directors said they could not predict the effect of the new "slippage factor." Opinions were divided among the remaining 18 percent of the Title I Directors.
- Did many districts reallocate resources to meet the comparability standards?
 - The vast majority of districts made no change in the allocation of resources to meet the comparability standards; the most common method of reallocation, however, was moving resources from non-Title I buildings to Title I buildings.

● To what extent were compliance agreements used to enforce the comparability standards?

- Fewer than one-third of the districts with comparability problems entered into a formal compliance agreement with the state, and only 1 percent of those districts had their Title I funds suspended because of comparability problems.

● What opinions did Title I Directors have of the revised ECIA comparability criteria?

- Some Title I Directors felt that the new ECIA comparability standards were acceptable (58 percent), or might provide relief from paperwork (24 percent); others, however, warned that the revised standards did not seem sufficient to ensure comparable resources between Title I and non-Title I schools (20 percent).

● Were districts having problems with the supplement-not-supplant and excess costs requirements?

- Twenty-eight percent of Title I Directors interviewed reported that their districts had problems implementing some aspect of the supplement-not-supplant requirement.
- Of the districts surveyed by mail, 16 percent reported that state staff reviewing their applications objected to program plans because of possible violations of state or Federal regulations; in 19 percent of these cases, state staff raised issues connected with supplanting.
- Ninety-one percent of the Title I Directors interviewed reported that their districts had no problems with the excess costs requirements.

INTRODUCTION

This chapter presents District Practices Study data pertaining to the Title I maintenance of effort, comparability, excess costs, and supplement-not-supplant requirements. Since other studies focused extensively on certain of these provisions,* the District Practices Study focused on local school officials' overall perceptions and concerns about these funds allocation requirements, as well as their reactions to changes made by Chapter 1 of ESEA.

The study generally found that school districts were not experiencing any major problems with implementing the Title I funds allocation provisions. The problems that did exist

*Previous analyses pertaining to the Title I maintenance of effort requirement include: General Accounting Office, "Proposed Changes in Federal Matching and Maintenance of Effort Requirements for State and Local Governments" (Washington, DC: GAO, December 1980); Aaron Gurwitz and Linda Darling-Hammond, Maintenance of Effort Provisions: An Instrument of Federalism in Education, R-2684-EO (Santa Monica, CA: Rand, Inc., June 1981). Among the previous analyses of the comparability requirements are: Lambda Corporation, "Fall 1973 Title I Comparability Survey," Vols. 1-3 (Washington, DC: Office of Program Evaluation, August 1974); Timothy Wirt, "Incrementalism in Educational Policy Making: A Case Study of Title I, ESEA," unpublished dissertation (Stanford, CA: Stanford University, 1973); R. Stephen Browning and Jack Costello, Jr., "Title I: More of the Same?" in Inequality in Education (Cambridge, MA: Harvard Center for Law and Education, June 1974); AUI Policy Research, Utilization and Effects of Alternative Measures of Comparability (Washington, DC: AUI Policy Research, August 1981). For previous analyses of the supplement-not-supplant requirements, see: NIE, "Federal Management in Ensuring the Supplementary Nature of Title I" in Administration of Compensatory Education (Washington, DC, 1977), pp. 23-45; Hal Winslow and Ann Herschberger, Supplement Not Supplant: A Note on the Definition and Use of a Title I Requirement (Palo Alto, CA: Stanford Research Institute International, 1977).

concerned, for the most part, the supplement-not-supplant and excess costs requirements. As had been found in the past, some districts seemed unaware of important implications that these closely related requirements had for the design of Title I programs, and had actually experienced problems implementing these provisions..

SUMMARY OF LEGAL REQUIREMENTS AND FINDINGS FROM THE DISTRICT PRACTICES STUDY

The Title I funds allocation provisions contained four interrelated requirements designed to ensure that Title I funds were spent for the purposes intended by Congress. The law required that districts maintain their own level of fiscal effort for free public education, and distribute state and local funds in a manner which guaranteed Title I program participants their full share of state and local services. State and local services in Title I attendance areas had to be comparable to those provided in non-Title I areas. Title I funds for program participants could only be used for the costs exceeding the average per pupil expenditure of state and local funds. Title I funds

had to supplement and not supplant the state and local funds to which Title I children were entitled.*

Each of these funds allocation provisions is described more fully below along with substantive findings from the Title I District Practices Study. Changes made by Chapter 1 of ECIA are also noted when presenting data on local district officials' perceptions of the likely effects of particular statutory modifications to Title I funds allocation requirements.

Maintenance of Effort

The maintenance of effort requirement stated that a district could receive Title I funds only if it maintained its "combined fiscal effort per student or the aggregate expenditures . . . [for] . . . free public education" (§126(a) of Title I). Compliance with this requirement was determined by comparing the district's expenditures for the preceding year to the second preceding year. The state education agency was required to make a

*The Title I legal framework included certain exceptions to these requirements, which were intended to increase flexibility and ensure that the basic purposes of Title I could be accomplished under varying conditions. Special exemptions from the comparability and excess costs requirements were provided for state compensatory education [SCE] programs and other special state or local funds. A different supplement-not-supplant requirement applied to these programs in order to facilitate their coordination with Title I. In addition, exceptions to the supplement-not-supplant requirement were provided for well-funded SCE programs, for schoolwide projects, and for all Title I staff to the extent necessary to permit them to perform routine non-instructional school duties customarily shared by all teachers. The District Practices Study did not focus on these exceptions, but limited its investigation to the basic aspects of these Title I funds allocation requirements.

finding that a district's fiscal effort had not dropped from the second preceding year to the first preceding year before it distributed Title I funds to the district.

As Congress stated when reauthorizing Title I in 1978:

The cornerstone of ESEA . . . [and] . . . the historic intent is that Federal dollars must represent an additional effort for the target children; thus, state and local education program expenditures must be maintained at previous levels (H.R. Rep. No. 1137, p. 139).

However, to increase flexibility and ensure that Federal purposes were adaptable to changing circumstances,

the Act authorizes the [Secretary] to grant a waiver of the maintenance of effort requirement for a single fiscal year in cases of exceptional or unforeseen circumstances such as a natural disaster or a precipitous and unforeseen decline in the financial resources of the state or local educational agency (H.R. Rep. No. 1137, p. 139).*

A 1980 study focused on maintenance of effort provisions in Federal laws found:

Only 28 LEAs fell out of compliance with the maintenance of effort provisions between fiscal years 1977 to 1980. Of these, 24 were granted waivers by the U.S. Office of Education (Gurwitz and Darling-Hammond, 1980, cited in ED's A Report to Congress, March 1982, p. 11-13).

*The House Report continued, stating that an example of a precipitous and unforeseen decline in financial resources that would justify a waiver "would be a major industrial or commercial facility leaving the area," but that "the decision of a state or local legislature to slash the education budget would not in and of itself constitute a valid decrease of financial resources since this is a voluntary and controllable act" (H.R. Rep. No. 1137, p. 139).

Data from both the DPS mail survey and the representative site visit interviews confirmed that most Title I Directors did not perceive maintenance of effort to be a major issue. The mail survey and interview findings presented in Table 7-1 show that only 6 percent of the Title I Directors believed that compliance with the program's maintenance of effort provision was a major issue in their districts.

Responses to a closely related mail survey question showed that since 1978, 98 percent of the districts had had no difficulty meeting the maintenance of effort requirement. Of the 10 districts reporting difficulty, 4 sought and received waivers, while others also received their full Title I allocations. Only one district had its allocation reduced for the year. Similarly, only 3 of the 100 Title I Directors interviewed had experienced a maintenance of effort problem since 1978 (see Table 7-2).

Chapter 1 of ECIA relaxes the Title I maintenance of effort standard, allowing a district, without penalty, to reduce state and local expenditures 10 percent from the second to the first preceding year (§558(a)(1)). Chapter 1 also retains a waiver provision similar to that in Title I.

The District Practices Study sought Title I Directors' initial assessments of the Chapter 1 maintenance of effort standard. As Table 7-3 shows, almost half of the mail survey districts responding to the question said the 10 percent "slippage factor" would help since the district would probably face a decline in state and local resources over the next

TABLE 7-1

PERCENT OF DISTRICTS IN WHICH TITLE I
DIRECTORS BELIEVED MAINTENANCE OF EFFORT
WAS A MAJOR ISSUE

	<u>Mail Survey</u>	<u>Representative Site Interviews</u>
Not a major issue	94	71
Major issue	6	6
No answer given	0	23
	<hr/>	<hr/>
	(352)*	(100)

*Number in parentheses below line in this and all subsequent tables is the number of respondents to this item.

TABLE 7-2

PERCENT OF DISTRICTS THAT EXPERIENCED DIFFICULTY
 WITHIN THE LAST THREE YEARS IN MEETING THE
 TITLE I MAINTENANCE OF EFFORT REQUIREMENT

	<u>Mail Survey</u>	<u>Representative Site Interviews</u>
No. difficulty meeting standard	98	95
Difficulty meeting standard	2	3
No answer given	0	2
	<hr/>	<hr/>
	(441)	(100)

TABLE 7-3

INITIAL ASSESSMENT BY TITLE I DIRECTORS
 OF 10 PERCENT "SLIPPAGE FACTOR" IN THE NEW
 CHAPTER 1 MAINTENANCE OF EFFORT REQUIREMENT

	<u>Percent</u>
Helps since district faces probable decline in state and local resources	48
Cannot predict	34
Probably does not help since district does not face probable decline in state and local resources.	7
Will provide flexibility to some districts but compromises purpose of provision	6
Needlessly restricts local practices	5
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (124)

several years. Over one third of the respondents, however, said they could not predict the effect of the new standard. A small number of districts (6 percent) indicated that the purpose of the maintenance of effort provision would be compromised by the "slippage factor."

Comparability

The comparability requirement was a prohibition against fiscal discrimination designed to "assure equity in funding for Title I children" (H.R. Rep. No. 1137, p. 31). This obligation required local educational agencies "to provide services in [Title I] project areas which, taken as a whole, are at least comparable to services being provided in areas" which were not receiving funds under Title I (§126(e) of Title I). To accomplish this, the regulations, with certain exceptions,* required an annual comparability report and reallocation of resources, if necessary, to ensure that Title I schools received comparable services:

A 1981 study of comparability found:

Seventy-five percent of the 44 districts [that volunteered to participate in the study, which granted 34 districts waivers from the requirement] perceived comparability requirements to conflict with state or local resource allocation policies. However, only one of these districts was able to provide a concrete example of how it was prevented from carrying out local policies for allocating staff, programs, and services. All other districts reported that they did carry out local policies for allocating staff, programs, and services. The one conflict described was the reallocation of staff to comply with comparability after the school year began. Except for eight districts,

reallocations involved fewer than three staff members (Ellman, Ferrara, Moskowitz, and Stewart, 1981, cited in ED's A Report to Congress, March 1982, p. 11-12).

The DPS mail survey sought to determine the extent to which districts had been required to reallocate resources to meet the present Title I comparability standard. The data indicate that only 8 percent of the Title I districts reported reallocating resources to meet the Title I standard; the remainder indicated that no reallocation has been necessary. Table 7-4 illustrates the types and effects of reallocations made by 19 interview districts. Most (42 percent) met the comparability requirement by hiring additional staff.

Mail survey data suggest that state Title I officials watch districts closely to ensure compliance with comparability. Thirty-one percent of the districts (441 districts) reported having entered into a formal comparability compliance agreement with the state within the last three years. States rarely suspended Title I funds to enforce compliance with comparability, however. Only 1 percent of 441 districts reported that their Title I funds had been suspended within the last three years because of comparability problems.

Chapter 1 of ECIA has a more flexible comparability provision than does Title I and relies on assurances rather than a mandatory report. Under Chapter 1, a district is deemed to have met the comparability requirements if it has filed with the SEA a written assurance that it has established (a) a districtwide salary schedule; (b) a policy to ensure equivalence among schools

TABLE 7-4

TYPES AND EFFECTS OF CHANGES MADE BY DISTRICTS TO MEET
THE COMPARABILITY STANDARDS

	<u>Percent</u>
Hired additional staff	42
Had to add resources	11
Changes are an accepted practice	11
Changes caused some morale problems	11
Reduced amount of staff time charged to Title I	5
Some teachers moved	5
Hired and transferred staff	5
Closed a school	5
No explanation	5
	<hr style="width: 10%; margin: 0 auto;"/> (19)

in teachers, administrators, and auxiliary personnel; and (c) a policy to insure equivalence among schools in the provision of curriculum materials and instructional supplies (§558(c)(2) of ECIA).

The District Practices Study asked Title I Directors to assess the revised comparability criteria in Chapter 1 of ECIA. Table 7-5 shows that, of the 84 respondents, over half (58 percent) reported they were "acceptable or posed no problem," while about a quarter (24 percent) said the revised criteria "seem to provide relief from paperwork." Other Directors are less certain, however. A fifth of the Directors reported that the revised comparability criteria "do not seem sufficient to ensure comparable resources between Title I and non-Title I schools." Almost 65 percent of the responding mail survey districts (30 districts) believed that the Chapter 1 comparability criteria need to be clarified. Fifty-one percent of the responding districts, however, believed that the clarification should not occur in binding regulations (see Table 7-6).

Supplement-not-Supplant and Excess Costs*

The basic supplement-not-supplant mandate provided that Title I funds could be used "only so as to supplement and, to

*The supplement-not-supplant and excess costs provisions had the same purpose, as explained by a recent study: "The excess costs provision is simply an extension of clarification of the supplanting provision. Title I funds are to be used to pay for supplementary services. Phrased differently, Title I funds can only be used to pay for the excess costs of supplementary aspects of a program" (Silverstein and Schember, 1977, p. 486).

TABLE 7-5

TITLE I DIRECTORS' ASSESSMENT OF REVISED
CHAPTER 1 COMPARABILITY CRITERIA

	<u>Percent*</u>
Acceptable or pose no problem	58
Seem to provide relief from paperwork	24
Do not seem sufficient to ensure comparable resources between Title I and non-Title I schools	20
Response concerns opinions about comparability rather than revised criteria	14
Not applicable	11
Will not make comparability easier to achieve	8
Don't know	6
Criteria unclear or ambiguous	2
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (84)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 7-6

PERCEPTIONS OF TITLE I DIRECTORS AS TO THE
EFFECT OF THE REVISED CHAPTER 1 COMPARABILITY
CRITERIA ON THEIR OWN SCHOOL DISTRICTS

	<u>Percent*</u>
Require clarification, but not binding regulations, to ensure comparable services across Title I and non-Title I schools	51
Provide necessary relief from paperwork and ensure that Title I schools will receive comparable resources from state and local sources	40
Cannot predict effect	34
Needlessly restrict local practices	15
Require clarification, including binding regulations, to ensure comparable services across Title I and non-Title I schools	14
Provide necessary relief from paperwork, but do not ensure that Title I and non-Title I schools will receive comparable resources from state and local sources	9
Other comments	9
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (30)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

the extent practical, increase the level of funds that would be made available in the absence of such Federal funds" (§126(c) of Title I). Further, "in no case may such funds be used to supplant such funds from non-Federal sources." In 1978 Congress explained that the basic purpose of the supplement-not-supplant provision was to prevent fiscal discrimination by ensuring that "children participating in Title I programs . . . receive their fair share of regular state and local funds" (S. Rep. 95-856, p. 15).*

The excess costs requirement, enacted in 1974 and designed to reinforce the supplement-not-supplant concept, provided that Title I funds could be used only for:

costs directly attributable to programs and projects which exceed the average per pupil expenditure of a local educational agency in the most recent year for which satisfactory data are available for pupils in the grade or grades included in such programs or projects (§126(b) of Title I).

In past years there was some uncertainty about what the supplement-not-supplant and excess costs provisions required to

*Other purposes were to ensure that children eligible for Title I programs, as a group, received their fair share of SCE funds and that Title I funds were not used to provide services that districts were required by law to fund with state or local money. The District Practices Study did not examine local policies concerning SCE funds allocation and the issue is not further discussed in this chapter. Overlap between Title I programs and services required by law to be provided with state or local resources occurs most frequently with respect to handicapped students, children with limited-English proficiency, and students receiving remedial services to prepare for minimum competency tests [MCT]. This chapter presents data concerning Title I and MCT remedial services while Chapter 5 discusses the "required by law" concept as it applies to the handicapped and those with limited-English proficiency.

ensure that Title I participants received extra, rather than substituted, services. Because the issues were not comprehensively addressed in early Title I regulations, and because "Federal administration of the requirements guaranteeing the supplementary nature of the program [was] neither clear nor consistent" (NIE, 1977b, p. 173), many districts did not understand the implications of the requirements for designing Title I programs (Demarest, 1977; Silverstein and Schember, 1977; Vanecko and Ames, 1980).

In an attempt to resolve this problem, Congress, in the legislative history of the 1978 Amendments, (1) discussed the lack of clarity and comprehensiveness in the supplanting regulations; (2) stated that Title I did not require a particular type of program design; and (3) directed that new Title I regulations contain "legal nonsupplanting models and include examples explaining how the general principles apply to day-to-day situations" (H.R. Rep. No. 1137, p. 29).

In the "final" regulations promulgated in January 1981, the supplement-not-supplant principles were illustrated through six program design models, known as excess costs models. These regulations identified circumstances under which districts were required to contribute state or locally funded instructional time to the Title I project to ensure that participants received supplemental rather than substituted services.*

*The Department of Education later decreed that the excess costs regulations were guidelines which could be followed rather than regulations which must be followed (46 F.R. 18976, March 27, 1982).

ED suspended the January 1981 "final" regulations, however, and Chapter 1, ECIA was subsequently enacted. The new law repeals the Title I excess costs provision, but retains the basic supplement-not-supplant requirement.*

Twenty-eight percent of the Title I Directors in the 100 representative site districts said they have had problems with the supplement-not-supplant requirement. One particular problem was designing supplementary programs for secondary schools. One-third of the Title I Directors interviewed stated that, in designing Title I projects for secondary school students, there were problems different from those involved in designing elementary programs. Of those perceiving this difference, approximately one-half (54 percent) stated that scheduling was more difficult at the secondary level, but 14 percent referred to the supplanting prohibition or the excess costs requirement. Forty-two percent of the Directors reporting problems in designing secondary school projects identified the problem as "determining what is supplement-not-supplant or excess costs."

Data from DPS case studies illuminate possible causes of supplanting problems. Of all the District Title I applications

*Regarding the Title I supplement-not-supplant requirement for SCE funds, however, Congress made a major change. Under the new law, all state or local funds expended for "special programs . . . consistent with" Chapter 1 may be excluded from determinations of compliance with the supplement-not-supplant requirement (§558(d) of ECIA). The practical effect of this provision, which legislatively overrides the court decision in Alexander v. Califano, 432 F. Supp. 1182 (N.D. Cal. 1977), is to allow districts the option of limiting state compensatory education programs to schools ineligible for Chapter 1.

reviewed during these case studies, none offered sufficient information to determine whether the proposed programs complied with the supplement-not-supplant provision. The deficiency was the same in each application--no indication of the intensity of regular program services to be received by Title I participants, as compared to the educational program of non-Title I participants.* Without this information, it was impossible to determine from the application whether Title I students received their fair share of services funded by state or local revenues.

Of interest, the DPS mail survey revealed that relatively few supplanting problems are uncovered during the Title I application approval process. Only 16 percent of the mail survey districts (335 districts) reported that state staff reviewing their applications had objected to program plans because of possible violations of state or Federal regulations. In only 19 percent of these cases had the state staff raised a supplanting question (see Table 7-7). Thus, application review appeared to uncover supplanting problems in only 3 percent of the districts, while 29 percent reported that they had had problems with this requirement.**

*This situation may change if states modify their application forms to reflect the excess costs/supplement-not-supplant program design models offered as examples in the guidelines.

**If most districts were solving their supplanting problems prior to submitting their applications, this would explain the low rate at which problems were identified by state officials. An alternative hypothesis would be that many applications contained insufficient information to determine the existence of supplanting problems, but were routinely approved.

TABLE 7-7

REPRESENTATIVE SITE INTERVIEW DISTRICTS PERCENT OF
PROGRAM AREAS IN WHICH STATE APPLICATION REVIEW
RAISED QUESTIONS ABOUT POSSIBLE VIOLATIONS

<u>Program Area</u>	<u>Percent*</u>
Parent involvement	29
Needs assessment	25
Eligibility and selection of children in greatest need	24
Program management and budgeting	23
Supplement-not-supplant	19
Attendance area eligibility and targeting	25
Preparation of district application	14
Other	10
Program design	7
Evaluation	5
Comparability	2
Coordination with other Federal/state education programs	1
Nonpublic participation	0
	<hr/>
	(55)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

Whether the apparent deficiency in Title I program applications was insignificant or evidenced widespread misunderstanding of the supplanting prohibition's impact on program design remains unclear, but other evidence bears on this question. During DPS interviews of Title I Directors, virtually none described supplanting as a failure to provide Title I students their fair share of state or locally funded services. Over a third defined supplanting as a problem involving use of Title I funds for ineligible students (a general aid problem, not a supplanting violation).

One Title I Director, for example, discussing a past "supplanting" problem in his district (teachers paid by Title I funds regularly instructing Title I students), solved the problem by switching the program from an inclass to a pullout design. Similarly, another Title I Director made the mistake of thinking his district "avoided all supplanting problems by making sure only Title I students received Title I services."

This confusion of general aid with supplanting does not in itself establish that many school districts misunderstand the true implications of supplement-not-supplant for the design of Title I programs, but two such examples among the Title I Directors interviewed may confirm such a hypothesis.

One Title I Director showed District Practices Study staff an accurate and insightful memorandum he had prepared on the implications of the supplanting requirement for Title I program design. He said he had written the memorandum after lengthy

reflection and detailed conversations with ED officials. Another Title I Director reported a similar experience. After many hours of analyzing the excess costs models set forth in ED Title I guidelines, this Director applied the pertinent principles to the fiscal circumstances of his district and developed a detailed resource distribution formula to ensure that each Title I student would receive a fair share of state and local services. District Practices Study staff found no comparable documents in other districts, and both of these exceptional Directors stated that their work led them to a new understanding of the meaning of the excess costs and supplement-not-supplant provisions for the design of Title I programs.

States appear to be aware of the need for some explanation and assistance in this area. Table 7-8 shows that of the 220 mail survey districts that identified subject areas in which they receive state technical assistance, about one quarter (26 percent) reported that the areas included supplement-not-supplant.

SUMMARY

The District Practices Study undertook a limited inquiry into district perceptions and concerns about Title I funds allocation provisions (maintenance of effort, comparability, supplement-not-supplant, and excess costs). The inquiry yielded general findings in several areas, but survey research is clearly not the best tool for analyzing the complex interrelatedness and operation of the funds allocation provisions. Despite these

TABLE 7-8

PERCENT OF DISTRICTS RECEIVING STATE HELP, BY PROGRAM AREA

<u>Program Area</u>	<u>Percent*</u>
Preparation of district application	.71
Evaluation	69
Parent involvement	48
Needs assessment	47
Program management/budgeting	46
Eligibility/selection of children in greatest need	44
Improve quality of instructional program	36
Supplement-not-supplant	26
Comparability	25
Attendance area eligibility/targeting	23
Coordination with other educational programs	21
Other	2
	<hr/>
	(220)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

obvious limitations, the data generally indicated the following:

- Maintenance of effort appeared to be a problem only in a limited number of districts, and opinion was divided on the impact of the new 10 percent "slippage factor" in the revised Chapter 1 maintenance of effort provision.
- Comparability was not perceived as a major issue in most districts. Most districts that had to reallocate resources to achieve comparability did so by moving resources from non-Title I buildings to Title I buildings.
- Many districts (almost two-thirds) perceived a need for clarification of the revised Chapter 1 comparability criteria; although over half of the districts felt the revised criteria are acceptable, a fifth of the districts doubted that the Chapter 1 criteria are sufficient to ensure comparability.
- Supplement-not-supplant and excess costs were requirements that appeared to provoke some uncertainty in some districts, particularly when confused with the general aid prohibition and when applied to the design and delivery of instructional services to ensure that Title I participants received supplemental rather than substituted services.

These findings suggest that school districts were not experiencing, or at least were not reporting, major problems with the Title I funds allocation provisions. The one possible exception is the supplement-not-supplant provision; it appears that some districts might still benefit from a fuller explanation of how this requirement applies to the design of truly supplemental programs.

CHAPTER 8

STATE ADMINISTRATIVE FUNCTIONS UNDER TITLE I AND STATE INFLUENCE ON DISTRICT PRACTICES

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

- To what extent do state officials object to aspects of district applications?
 - Many districts reported that the state approved their applications (1) without objections about educational ineffectiveness (97 percent); (2) without objections about possible violations of Federal or state regulations (84 percent); and (3) without revisions to the application (73 percent). However, 44 percent of the districts said that application approval had become more rigorous since the 1978 amendments.
- Have states increased their monitoring activities since 1978?
 - Most districts (78 percent) reported no increase in the frequency of formal on-site monitoring visits since 1978; only 22 percent indicated an increase in such monitoring since 1978.
- To what extent and with what success are states providing technical assistance to districts?
 - Over half of the districts (55 percent) reported that the quality or availability of state technical assistance had increased since 1978. The majority of districts (68 percent) had received state technical assistance and were satisfied with it. Yet 32 percent of the districts reported they did not receive technical assistance from the state.
- Do districts perceive state requirements to be more strict than Federal regulations?
 - Almost two-thirds (64 percent) of the districts indicated that state Title I regulations were not more restrictive than Federal regulations. However, within-state analyses of the 29 states with 7 or more respondent districts showed considerable disagreement on this point.

● What has been the extent and effect of program auditing since 1978?

- Most districts (70 percent) said their Title I program had been included in audits (state, Federal, or both) since 1978; however, some districts (30 percent) reported that their Title I program had not been included in an audit since 1978. Eighty percent of the districts indicated that Federal auditors examined both financial records and compliance with Title I regulations; only 70 percent of state auditors did this. Many districts reported making changes in the operation of their Title I programs as the result of audit findings and exceptions.

● Have states influenced changes in the grade levels at which services are provided?

- Only 26 percent of the districts reporting a substantial change in the number of Title I students served by grade level since 1978 considered state influence a very important or somewhat important reason for substantial changes in the number of Title I students served by grade level since 1978.

● Have states influenced changes in the program instructional areas?

- Only 23 percent of the districts indicating a substantial change in subject area emphases of their Title I program said state influence was a very important or somewhat important reason for these changes.

● Have states encouraged districts to use the pullout program design?

- Forty-six percent of the districts using a pullout design for part or all of their Title I program indicated that state influence was a very important or somewhat important reason for doing so.

● Have states influenced changes in staffing or curricula?

- Thirty-four percent of the districts making changes in Title I staffing or curricula since 1978 reported that state influence was a very important or somewhat important reason for those changes.

● Do districts perceive states as barriers to desirable program change?

- Over two-fifths (45 percent) of the districts that would like to change features of their Title I program defined state influence as a very important or somewhat important barrier to desired program changes.

INTRODUCTION

Title I was implemented through an intergovernmental system in which states played an administrative oversight role by:

- Approving Title I applications from school districts
- Monitoring school district Title I programs
- Providing technical assistance to help school districts implement Title I
- Developing state Title I policies or regulations
- Conducting fiscal and compliance audits of local Title I programs and resolving audit exceptions and findings*

Previous research indicated that states differed considerably in how they carried out their administrative responsibilities under Title I (Berke and Kirst, 1972; Goettel, Kaplan, and Orland, 1977; Gaffney, Silverstein, and Thomas, 1977). The NIE Compensatory Education Study noted the same diverse practices:

The Study of State Administration corroborated the finding of widely varying state practices. States vary greatly from one to another in the way they disseminate information, provide technical assistance and enforce compliance (NIE, 1977, p. 51).

NIE also found that the manner in which states administer Title I can influence how school districts implement the program. In this regard, NIE examined state use of Title I administrative staff to carry out Title I responsibilities and noted that data "suggest a relationship between state staffing practices and the

*States also have responsibilities concerning the evaluation of Title I programs; withholding or suspending Title I funding as an enforcement mechanism or entering into compliance agreements in lieu of withholding funds; and resolving complaints about the Title I program.

quality of administration at both the state and local levels" (NIE, 1977, p. 54). NIE findings suggest the potential influence of state Title I staff on local programs:

- The more time that state staff spent with local staff, the greater the likelihood that local programs would be well-administered.
- Application workshops, monitoring visits, or technical assistance visits appeared equally valuable in improving LEA performance.
- The greater the efforts a state made to clarify, record and disseminate both Federal and state regulations, the less likely its districts were to experience compliance problems (NIE, 1977, p. 55).

As a result of these and other NIE findings about state practices, Congress clarified state administrative responsibilities in the 1978 Amendments and increased the amount of the funding set aside for state administration. This revised legal framework for Title I state administration was part of the context in which the District Practices Study examined district perceptions of the state role and its influence since 1978.

This chapter first briefly describes the Title I legal framework for the key state administrative functions of application approval, monitoring, technical assistance, rulemaking, and auditing and audit resolution. It then presents District Practices Study data concerning local Title I administrators' perceptions of (1) how states carried out their administrative responsibilities and how this generally influences districts*;

*The District Practices Study included only a limited inquiry into the state role and its influence on district implementation of Title I. A companion study of state Title I administration was undertaken by the American Institutes for Research (AIR). The District Practices Study considered state influence in examining rationales given by school districts for their Title I practices.

(2) whether there were any changes since the Education Amendments of 1978 in how states approved applications, monitored, and provided technical assistance; and (3) whether state influence impacts on Title I program changes involving numbers of students served, subject area emphases, the use of pullout and inclass designs, and staffing or curricula approaches, as well as constraints on program change. The chapter concludes with a summary which discusses possible implications of the findings.

TITLE I LEGAL FRAMEWORK

State Approval of District Title I Applications

The State Educational Agency [SEA] was responsible for approving Title I applications submitted by school districts.* The SEA had to make certain determinations before approving an application. In part, the SEA had to determine, "subject to such basic criteria as the [Secretary] may prescribe," that the application (1) provided for the use of . . . funds in a manner which meets [applicable] requirements" and (2) was "consistent with the assurances contained in the general application" (§121 of Title I).

*§121 of Title I provides that a district may receive a Title I grant if it has on file with the state a current application, approved by the [SEA], describing the programs and projects to be conducted . . . for a period not to exceed three fiscal years, including the fiscal year for which the grant is made." This provision allows use of either an annual application or a three year application with annual updates.

In 1978 Congress also required that, prior to approval of an application, an SEA consider, where pertinent:

- The results of Federal and state audits
- The results of Federal and state monitoring reports
- Administrative complaints by parents or other individuals concerning the applicant's compliance with Title I and school district
- The results of district Title I evaluation reports (§164(a)(1)(2) of Title I)

Other conditions for approval were (1) the district was not out of compliance with a determination of the SEA or the Secretary that it repay misused Title I funds and (2) the district was not out of compliance with a compliance agreement entered into with the SEA in lieu of withholding funds for noncompliance (§164(a)(1)(B) of Title I).

The SEA could not finally disapprove a Title I application, in whole or in part, without first affording the applicant reasonable notice and opportunity for a hearing (§164(c) of Title I and 434(b)(1) of GEPA).

State Monitoring Of District Title I Programs

In the 1978 Amendments Congress, citing a GAO report which found serious inadequacies in state monitoring of Title I,*

*As the legislative history explains:

the Committee has previously stressed the importance of state monitoring of Title I programs in its report on the 1974 amendments. Yet, a 1975 GAO Report about Title I... cited the need for improved monitoring of Title I programs. The GAO study found that about 35 percent of the state educational agencies visited as part of the study had no formal monitoring systems for Title I (H.R. Rep. No. 1137, p. 44; S. Rep. No. 856, p. 60).

decided to be more specific about state responsibility for monitoring district Title I programs. Consequently, §167 of Title I required that the SEA adopt standards for monitoring district Title I programs. These standards had to be consistent (1) with minimum standards established by the Secretary and (2) with the state monitoring and enforcement plan which §171 of Title I required be submitted to the Secretary (§167 of Title I).

The state monitoring standards had to (1) describe the purpose and scope of monitoring; (2) specify the frequency of on-site visits; (3) describe the procedures for issuing and responding to monitoring reports, including but not limited to, the period of time in which the SEA must issue its reports, the period of time in which the applicant agency must respond, and the appropriate follow-up by the SEA; (4) specify the methods for making monitoring reports available to parents, state and local auditors, and other persons, and (5) specify the methods for ensuring that noncompliant practices are corrected (§167 of Title I). The monitoring and enforcement plan that the SEA submitted under Title I was required to include a report "of the activities undertaken by the State in the years since the previous plan was filed to carry out its monitoring and enforcement efforts" under Title I (§171 of Title I; also see §434(a)(1) of GEPA).

State Technical Assistance

In 1978 Congress clarified state responsibilities for technical assistance, including information dissemination. Each

state had to assure the Secretary in its general application that it would adopt and use proper methods of administering each program, including:

- providing technical assistance, where necessary, to agencies, institutions, and organizations,
- encouraging the adoption by . . . agencies, institutions, and organizations of promising or innovative educational techniques, and
- disseminating throughout the state information on program requirements and successful practices (§435(b)(3)(B), (C), (D) of GEPA).

More specifically, §166 of Title I required that each SEA carry on a "comprehensive program to provide technical assistance" to school districts. The "comprehensive program" had to include technical assistance (1) for management procedures, (2) for planning, development, implementation, and evaluation of programs; and (3) for preparation of applications, as well as (4) other forms of technical assistance needed (§166 of Title I).

Title I also mandated that SEAs provide school districts with technical assistance for evaluation. Section 183(c) of Title I required that the Secretary provide "such technical and other assistance as may be necessary to [SEAs] to enable them to assist [districts] and state agencies in the development and application of a systematic evaluation of programs in accordance with the [evaluation] models" developed by the Secretary.

State Rulemaking

To clarify state authority to adopt state Title I rules and regulations, the 1978 Amendments provided in §165 of Title I that

nothing in Title I prevented states from having such rules and regulations as long as they did not conflict with Title I or other Federal law.

In recognition of state and local differences within a Federal system, §165 of Title I also required that the Secretary encourage states adopting such rules "to recognize the special and unique needs and circumstances of the State and of each [district] in the State."

State Audits and Audit Resolution

In 1978 Congress emphasized state audit and audit resolution responsibilities because of concern about (1) the manner in which some states had failed to perform these functions adequately, and (2) state audits that examined only expenditures, but not compliance, as required by the regulations.

Section 170 of Title I required that "each State shall make provisions for audits of the expenditure of funds. . . ." The audits must determine, at a minimum, (1) "the fiscal integrity of grant or subgrant financial transactions and reports" and (2) the compliance with applicable statutes, regulations, and terms and conditions of the grant or subgrant (§170 of Title I).

Audits had to be made "with reasonable frequency, usually annually, but not less than once every two years, considering the nature, size, and complexity of the activity" (§170 of Title I).

Congress also clarified the obligation of the states to resolve audits. Section 170 of Title I required that each SEA have in effect "written procedures, meeting minimum standards

established by the Commissioner, to assure timely and appropriate resolution of audit findings and recommendations. . . . " The procedures had to include: (1) a description of the audit resolution process, (2) timetables for each step of the process, and (3) an audit appeals process.

FINDINGS ABOUT KEY STATE ADMINISTRATIVE FUNCTIONS

State Approval of District Applications

Mail survey data indicate that more than half (55 percent) of the districts used a three year application with annual changes instead of an annual application. State influence on the use of the annual, as opposed to the three year, application is significant. Table 8-1, which displays (by district size) reasons given by districts for use of the annual application, shows that 80 percent of the large and very large districts using an annual application did so because the state required it.

Most of the districts surveyed (73 percent) reported that the state did not ask (either formally or informally) the district to explain or change its last application. The remaining districts gave a variety of reasons why the state asked for an explanation or change of the last application. As Table 8-2 indicates, over two-fifths of these districts (42 percent) reported that the state asked for a revision or explanation either because of a state monitoring report (39 percent) or a Federal monitoring report (3 percent). Nearly a third of the districts (30 percent) indicated that an evaluation of the district program was the reason. The next most frequent reason

TABLE 8-1

INFLUENCE OF STATES ON DISTRICTS' USE
OF ANNUAL APPLICATION

	<u>Percent of Small Districts</u>	<u>Percent of Medium Districts</u>	<u>Percent of Large Districts</u>	<u>Percent of Very Large Districts</u>
State requirement	68	66	80	80
District choice	8	21	20	20
Don't know	24	13	0	0

TABLE 8-2

PERCENT OF DISTRICTS REPORTING STATES REASONS
FOR ASKING FOR EXPLANATION OR REVISION
OF TITLE I APPLICATION*

	<u>Percent**</u>
State monitoring report	39
Title I evaluation	30
State audit	17
Federal monitoring report	3
Title I complaint	2
Federal audit	0
Other	53
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (91)***

*This table displays data from the 27 percent of the districts indicating that the state asked for explanation or revision of the application.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

***Number in parentheses below line in this and all subsequent tables is the number of respondents to this item.

was a state audit (17 percent). These reasons do not vary significantly by district size.

Districts were also asked whether the state objected to the last application because of possible violations of state or Federal regulations. Only 16 percent of districts said the state objected for these reasons. Table 8-3 shows the different program areas in which these districts indicated the state thought there were possible violations of state or Federal regulations. Parent involvement (28 percent) was the most frequently cited program area. The related areas of student selection and needs assessment were the next most frequently mentioned program areas.

U Districts reported that states are five times as likely to object to an application for reasons of compliance with state or Federal regulations (15 percent) as they are for reasons of educational effectiveness (3 percent).

Most districts report that the last state review of their Title I application had little influence on their programs. This may be because most districts had internalized state expectations after fifteen years of experience with state approval of district Title I applications. However, the data indicate that there were still some disagreements about how to assess needs and select students, as well as out how to implement the detailed provisions for parental involvement.

Even if most districts have become experienced in meeting state expectations about application approval, many districts

TABLE 8-3

PERCENT OF DISTRICTS REPORTING PROGRAM AREAS IN WHICH THE STATE THOUGHT THERE WERE POSSIBLE VIOLATIONS OF STATE OR FEDERAL REGULATIONS WHEN REVIEWING THE DISTRICT APPLICATION*

	<u>Percent**</u>
Parent involvement	28
Student selection	24
Needs assessment	23
Program management and budgeting	23
Supplement-not-supplant	20
Preparation of district application	15
School attendance area eligibility and targeting	15
Program design	10
Evaluation	7
Comparability	6
Coordination with other Federal and state education programs	1
Other	8
	<hr style="width: 100%; border: 0.5px solid black; margin-bottom: 5px;"/> (67)

*This table displays data from the 16 percent of the districts reporting state objections to program plans because of possible violations of state or Federal regulations.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

think the state has become more rigorous about application approval since the Education Amendments of 1978. Data from the representative site interviews indicate that 44 percent of the districts reported the state had been more rigorous about application approval since 1978.* Thirty-eight percent reported no change since 1978, and 7 percent said the state had been less rigorous since 1978. Eleven percent did not answer the question.

State Monitoring

Over three-fourths (78 percent) of the districts reported no increase in the frequency of formal on-site monitoring visits by state staff since 1978. Nearly a quarter (22 percent), however, said that the frequency of such visits had increased since 1978.

The size of a district appears to be a factor in (1) how frequently districts received formal on-site monitoring visits, (2) how many persons are used to monitor, and (3) how long the monitoring visit lasts.

Table 8-4, which breaks down the frequency of monitoring visits by district size, shows that large and very large districts are formally monitored on an annual basis somewhat more often than small or medium districts. Similarly, the number of persons on the monitoring visits varies by district size, as

*Explanations of how the application review process had become more rigorous fell into categories such as: state now checks all facets of the application; state staff work more closely with districts on the application; state is stricter about student selection; state requires greater elaboration of objectives and evaluation plan.

TABLE 8-4

PERCENT OF DISTRICTS REPORTING THE FREQUENCY OF FORMAL MONITORING VISITS BY STATE TITLE I STAFF OR CONSULTANTS TO DISTRICTS IN THE LAST THREE YEARS

	<u>District Size</u>			
	<u>Small</u>	<u>Medium</u>	<u>Large</u>	<u>Very Large</u>
Twice a year or more	3	6	5	8
Once a year	9	10	14	20
Every two years	4	4	3	0
Every three years	8	4	2	0
Never	1	1	0	0
Other	1	0	0	0

Table 8-5 indicates. Eighty-eight percent of the small districts, for example, reported one or two state staff came on the last formal monitoring visit, but 51 percent of the large and very large districts said that 8-10 people came on the last formal monitoring visit. District size was also a factor in the length of the last formal monitoring visit, as Table 8-6 indicates. Large and very large districts reported more often that the last formal monitoring visit was more than two full days, compared to the small and medium districts indicating monitoring visits of the same duration.

Mail survey respondents were asked to indicate which of 16 areas monitors actually examined during their formal monitoring visits. Table 8-7 ranks these items by the frequency with which districts reported they were examined. The aspects examined most frequently were records (95 percent), parent involvement (94 percent), child eligibility and selection (92 percent), and compliance with legal requirements (90 percent).

There is some significant variation by district size for 9 of the 16 aspects that monitors examined, as indicated by Table 8-8. In general, more program areas are reported as being reviewed in more large and very large districts than are reported as being reviewed in small and medium districts.

State Technical Assistance

Over two-thirds (68 percent) of the districts surveyed by mail indicated that they received technical assistance from the state Title I office in developing or improving some aspect of

TABLE 8-5

PERCENT OF DISTRICTS REPORTING
NUMBER OF STATE STAFF OR CONSULTANTS
ON THE LAST FORMAL MONITORING VISIT

<u>Number of State Staff or Consultants</u>	<u>District Size</u>			
	<u>Small</u>	<u>Medium</u>	<u>Large</u>	<u>Very Large</u>
One	66	47	25	0
Two	22	31	22	13
Three	8	13	23	13
Four	2	6	18	13
Five	2	3	9	13
Six	0	1	0	13
Seven	0	1	0	0
Eight	0	0	3	25
Ten	0	0	0	13
Twelve	0	0	1	0

TABLE 8-6

PERCENT OF DISTRICTS REPORTING
LENGTH OF LAST FORMAL MONITORING VISIT

	<u>Small</u>	<u>Medium</u>	<u>Large</u>	<u>Very Large</u>
Half a day or less	48	9	4	13
Full day	38	45	28	0
Day and a half	2	7	4	13
Two full days	9	26	30	38
More than two full days	4	14	34	38

TABLE 8-7

ASPECTS OF TITLE I PROGRAMS THAT MONITORS
EXAMINED ON LAST FORMAL MONITORING VISIT

	<u>Percent*</u>
Records	95
Parent involvement	94
Child eligibility and selection of those in greatest need	92
Compliance with legal requirements	90
Evaluation	89
Implementation of program according to application	89
Needs assessment	88
Quality of services provided	80
Supplement-not-supplant	79
Training of staff and others	75
School attendance area eligibility and targeting	71
Complaint resolution procedures	64
Participation of teachers and school board members in planning	63
Comparability	61
Nonpublic participation	55
Neglected or delinquent program	19
Other	3

(322)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 8-8

ASPECTS OF TITLE I PROGRAMS EXAMINED
BY STATE MONITORS ON LAST FORMAL MONITORING VISIT

	<u>District Size</u>			
	<u>Small</u>	<u>Medium</u>	<u>Large</u>	<u>Very Large</u>
School attendance area eligibility and targeting	64	84	89	88
Student selection	89	95	98	100
Needs assessment	85	87	98	100
Comparability	53	73	83	75
Supplement-not-supplant	75	85	93	88
Implementation of program according to application	86	95	98	100
Training of staff	72	77	90	88
Nonpublic participation	45	69	86	100
Neglected or delinquent program	16	26	38	63

their Title I programs. The remaining districts (32 percent) said the state did not provide technical assistance to develop or improve their programs.

State technical assistance was provided in a variety of areas, as shown in Table 8-9. The most frequent and most general area in which districts (72 percent) reported receiving help was in preparation of the district application. Sixty-eight percent of the districts indicated that technical assistance for evaluation was received. Large percentages of districts said technical assistance was provided in the areas of program management and budgeting (48 percent), parental involvement (47 percent), needs assessment (46 percent), and child eligibility and selection (42 percent).

Table 8-10 sets forth the different ways in which state Title I staff provided technical assistance to districts. Telephone calls were clearly the most favored method, while site visits (39 percent) are the least frequently reported means of providing technical assistance.

Districts also reported receiving technical assistance from sources other than the state Title I office. Table 8-11 indicates that 26 percent of the survey districts said help was received from Title I Technical Assistance Center [TAC] staff. Some districts (15 percent) reported state officials not in the Title I office provided assistance and an even smaller percentage of districts (6 percent) named Federal officials as another source of technical assistance.

TABLE 8-9

ASPECTS OF TITLE I PROGRAMS THAT
STATE HELPED DEVELOP OR IMPROVE

	<u>Percent*</u>
Preparation of district application	72
Evaluation	68
Program management and budgeting	48
Parent involvement	47
Needs assessment	46
Child eligibility and selection of those in greatest need	42
Improving quality of instructional program	38
Supplement-not-supplant	28
Comparability	24
School attendance area eligibility and targeting	22
Coordination with other Federal and state education programs	22
Other	3
	<u> </u>
	(220)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 8-10

MOST FREQUENT MANNER IN WHICH STATE
TITLE I STAFF HELPED DISTRICT TITLE I PROGRAM

	<u>Percent*</u>
Telephone calls	87
Workshops	76
Printed materials (e.g., manuals, newsletters)	66
Letters	65
Consultants assigned to district	46
Site visits	39
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (230)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 8-11

SOURCES OF TECHNICAL ASSISTANCE
FOR DISTRICT TITLE I PROGRAMS OTHER THAN
STATE TITLE I OFFICIALS

	<u>Percent</u>
Technical Assistance Center [TAC] staff	26
State officials not in Title I program	15
Regional Federal office staff or other Federal officials	6
Other	14
	<u>(386)</u>

With respect to changes in state technical assistance since the Education Amendments of 1978, 55 percent of the districts surveyed by mail perceived an improvement in the quality or availability of state technical assistance since 1978. Forty percent of the districts say there was no change in state technical assistance during the same period, and only 5 percent reported a deterioration in either the quality or availability of state technical assistance since 1978.

State Rulemaking

The District Practices Study sought to determine whether districts perceived any state Title I regulations as being more restrictive than Federal Title I regulations and, if so, in what program areas were state Title I regulations thought to be more restrictive than the Federal regulations. Almost two thirds (64 percent) of districts surveyed on this issue said state Title I regulations were not more restrictive. However, 20 percent perceived some state Title I regulations as more restrictive than the Federal regulations. Another 16 percent indicated they don't know if any state regulations are more restrictive than the Federal regulations. District size was not found to be a major factor in these perceptions.

Table 8-12 presents data on the different areas in which district officials considered state Title I regulations more restrictive than the Federal regulations. The leading area was the most general: preparation of the district application (42 percent). The same percent of districts (38 percent) perceive

TABLE 8-12

AREAS IN WHICH DISTRICT OFFICIALS CONSIDERED STATE
TITLE I REGULATIONS AND POLICIES TO BE MORE
RESTRICTIVE THAN FEDERAL TITLE I REGULATIONS*

	<u>Percent**</u>
Preparation of district application	42
Evaluation	38
Parental Involvement	38
Child eligibility and selection of those in greatest need	37
Program management and budgeting	37
Program design	34
Parent involvement	27
Needs assessment	27
Supplement-not-supplant	22
School attendance area eligibility and targeting	17
Coordination with other Federal and state education programs	16
Nonpublic participation	15
Comparability	14
Other	16
	(230)

*This table displays data from the 20 percent of the districts reporting state Title I regulations and policies to be more restrictive than Federal regulations.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

state evaluation and state parent involvement requirements as more restrictive than the Federal requirements.

To determine if any states were uniformly regarded as having any more restrictive regulations, data from 29 states with 7 or more respondent districts in each were examined. In 18 of these states (62 percent), there was not unanimous agreement regarding the relative restrictiveness of the state regulations.* In only 3 of these states (10 percent) was there unanimity in saying that state Title I regulations were not more restrictive than the Federal regulations. Districts in each of the remaining 8 states (28 percent) were split. In each of these 8 states, some districts did not know if state Title I regulations were more restrictive and some districts said the state regulations were not more restrictive.

The contradictions in some of the 18 states which disagree about the relative restrictiveness of state Title I regulations were marked. In the 5 states (out of these 18) with the most respondent districts, there was a distinct split among districts in the same state in 4 of the states about whether state regulations were more restrictive. There was only minor disagreement in the remaining state in which 90 percent of the districts said state Title I regulations were not more restrictive than the Federal regulations.

*In all but 4 of these 18 states, some districts also said they did not know if any state Title I regulations were more restrictive.

Audits and Audit Resolution

The mail survey asked Title I Directors whether their Title I program had been included in an audit within the last three years. As Table 8-13 indicates, over two-thirds of the districts responding to this question indicated that their Title I program had been included in either a Federal or state audit, or in both a Federal and state audit. Slightly less than a third of these districts (30 percent) reported that their Title I program has not been included in either a Federal or state audit within the last 3 years.

Title I required that Federal and state audits of Title I examine both financial transactions and compliance with program requirements. Table 8-14 indicates that nearly a quarter (23 percent) of the districts said that state auditors looked at financial records only. The percentage of districts reporting that Federal auditors examined both financial records and compliance (80 percent) was similar to the percentage of districts reporting that state auditors examined both areas (70 percent). There does not appear to be an appreciable difference between the extent to which Federal and state auditors' reports contained audit exceptions or recommendations for corrective action. Mail survey data show that 30 percent of the districts indicated Federal auditors' reports contained exceptions or recommendations, while 26 percent of the districts said state auditors' reports contained exceptions or recommendations.

TABLE 8-13

PERCENT OF DISTRICTS INCLUDED IN STATE
OR FEDERAL AUDITS IN LAST THREE YEARS

	<u>Percent</u>
State audit only	55
No Federal or state audit	30
Both Federal and state audits	11
Federal audit only	4
	<hr/>
	(333)

TABLE 8-14

PERCENT OF STATE AND FEDERAL AUDITS
EXAMINING FINANCIAL RECORDS AND
COMPLIANCE WITH TITLE I REGULATIONS

	<u>Federal Audits</u>	<u>State Audits</u>
Both financial records and compliance	80	70
Financial records only	7	23
Don't know	13	7
	-----	-----
	(52)	(210)

FINDINGS ABOUT OTHER INDICATORS OF STATE INFLUENCE

The District Practices Study also examined district perceptions of state influence on changes in the local Title I program in such areas as (1) the number of students served; (2) subject area emphases; (3) pullout and inclass designs; (4) staffing or curricula approaches; and (5) constraints on program change.

State Influence on Changes in the Number of Students Served

Mail survey districts were asked whether there had been a substantial change (more than 10 percent) in the number of students served in any grade in their programs since 1978. Sixty-one percent of the districts responded that there had been no such change, while one-third (33 percent) said there was a substantial change in the number of students served in different grades since 1978.

The districts which indicated a substantial change in the number of students were then asked to rank the five most important reasons for the change. As Table 8-15 indicates, most districts (84 percent) did not rank state influence ("new state mandates or emphasis") as one of the five most important reasons for change in the number of students served in different grades since 1978.

State Influence on Changes in Subject Area Emphases

The mail survey asked if there had been a substantial change in the subject areas emphasized in the district's Title I program

TABLE 8-15

DISTRICT REASONS FOR SUBSTANTIAL CHANGE
(MORE THAN 10 PERCENT) SINCE 1978 IN NUMBER OF
STUDENTS SERVED IN TITLE I FOR ANY GRADE*

	<u>Percent**</u>
Changes in Title I funding level	50 (71)***
Teachers' or Principals' recommendations	30 (43)
Data from formal needs survey	30 (42)
Results of formal Title I program evaluations	25 (36)
Demographic changes	20 (28)
New state mandates or emphasis	16 (23)
New district mandates or emphasis	15 (21)
Changes in other local programs	14 (20)
Informal assessments of program performance	13 (19)
Parents' recommendations	11 (16)
Other	11 (15)

*This table displays data from the 33 percent of the districts reporting a substantial change in the number of students served in different grades since 1978.

**A maximum of 5 reasons were included for each district.

***N for each response is in parentheses.

since 1978.* Sixty-nine percent of the districts reported no change. However, 30 percent of the districts said there was a change in subject area emphasis (1 percent of the districts did not know if there was a change).

Those districts reporting substantial change then ranked the five most important reasons for the change. Table 8-16 indicates that state influence ("new state mandate or emphasis") did not emerge among the five most important reasons and 24 percent of the districts gave this as the sixth most important reason.

State Influence on Changes in the Use of Pullout and Inclass Designs.

Ninety-two percent of the districts said they used a pullout design for part or all of their Title I programs. Table 8-17 shows that only 46 percent of the districts using the pullout for part or all of their programs gave state influence ("state Title I office has advised the use of this design") as a very important or somewhat important reason for use of pullouts. Thus, state influence ranked third behind educational superiority (81 percent) and compliance with funds allocation requirements (60 percent) as a reason for use of the pullout design for part or all of the program.

Although 80 percent of the districts said there have not been changes in use of the pullout design since 1978, 10 percent

*A substantial change was defined as either (1) a change of 10 percent or more in the number of students served in particular subject areas since 1978 or (2) a change of 10 percent or more in subject area's share of the budget. Subject areas included reading, other language arts, mathematics, English for students of limited-English background, vocational, and special education for the handicapped.

TABLE 8-16

DISTRICT REASONS FOR SUBSTANTIAL
CHANGE OF SUBJECT AREA EMPHASIS IN
TITLE I PROGRAMS SINCE 1978*

	<u>Percent**</u>	
Changes in Title I funding level	44	(42)***
Data from formal needs surveys	41	(39)
Teachers' or Principals' recommendations	38	(36)
Results of formal Title I programs evaluations	27	(26)
Parents' recommendations	26	(25)
New state mandates or emphasis	24	(23)
New district mandates or educational philosophy	20	(19)
Informal assessments of program performance	18	(17)
Changes in other local programs	14	(13)
Demographic changes	4	(4)
Other	3	(3)

*This table displays data from the 30 percent of the districts reporting a substantial change in Title I subject area emphasis since 1978.

**A maximum of 5 reasons were reported for each district.

***N for each response is in parentheses.

TABLE 8-17

REASONS THAT DISTRICTS USE A PULLOUT
DESIGN FOR PART OR ALL OF THEIR PROGRAM*

	Percent of Districts Saying This Is A Very Important or Somewhat Important Reason**
Pullout is educationally superior for all or part of program	81
Pullout makes it easier to demonstrate compliance with funds allocation requirements	60
State Title I office has advised use	46
Although different design might work as well, it would not be worth disruption of changing	33
Other	18
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (1149)

*This table displays data from the 92 percent of the districts reporting use of a pullout design for part or all of their programs.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

of the districts indicated an increase in use of pullouts, and 10 percent reported a decrease in use of pullouts since 1978. Table 8-18 indicates that only 37 percent of the districts increasing or decreasing the use of pullouts identified state influence ("new state mandates or emphasis") as a very important or somewhat important reason for the change.

A similar degree of state influence is evident with regard to use of the inclass design. Only 30 percent of the districts said they used the inclass approach for part or all of their programs. Of those using the inclass design, less than a third (30 percent) pointed to state influence ("state Title I office has advised the use of the design") as a very important or somewhat important reason for doing so, as Table 8-19 indicates. Thus, state influence also ranks third, behind educational superiority (75 percent) and lack of facilities for pullouts (41 percent), as a reason given by districts for use of the inclass approach.

Over half (57 percent) of the districts with inclass designs said there had not been much change since 1978 in use of the inclass approach. Of the remaining districts, 33 percent indicated increased use during the same period and 10 percent reported decreased use. Table 8-20 displays the reasons these districts gave for this increase or decrease and indicates that only 34 percent of these districts point to state influence ("state Title I office has advised the use of this design") as a very important or somewhat important reason for the changes in

TABLE 8-18

REASONS WHY DISTRICTS INCREASED OR
DECREASED USE OF PULLOUT DESIGN SINCE 1978*

	Percent of Districts Saying This Is A Very Important or Somewhat Important Reason**
Teachers' or Principals' recommendations	75
Informal assessments of program performance	58
Results of formal Title I program evaluations	56
Parents' recommendations	52
Data from formal needs survey	51
Changes in Title I funding level	50
New district mandates or educational philosophy	42
New state mandates or emphasis	37
Changes in other local programs	30
Demographic changes	16
Other	15

*This table displays data from the 20 percent of the districts which increased or decreased use of a pullout design since 1978.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 8-19

REASONS WHY DISTRICTS USE INCLASS
DESIGN FOR PART OR ALL OF THEIR PROGRAM*

	Percent of Districts Saying this is a Very Important or Somewhat <u>Important Reason**</u>
Inclass is educationally superior for all or part of program	75
Physical facilities for pullouts are not available	41
State Title I office has advised use	30
Although different design might work as well, it would not be worth disruption of changing	21
Other	21
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (501)

*This table displays data from the 30 percent of the districts that use an inclass design for part or all of their program.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 8-20

REASONS WHY DISTRICTS INCREASED OR
DECREASED USE OF INCLASS DESIGN SINCE 1978*

	Percent of Districts Saying this is a Very Important or Somewhat Important Reason**
Inclass design is educationally superior for all or part of program	72
Physical facilities for pullouts are not available	36
State Title I office has advised use	34
Although different design might work as well, it would not be worth disruption of changing	17
Other	30
	(244)

*This table displays data from 43 percent of the 30 percent of the districts which use an inclass design for part or all of their programs and which indicated increased or decreased use of the inclass design since 1978.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

use of the inclass design. This means that state influence again ranks third, behind educational superiority (72 percent) and lack of facilities for pullout (36 percent), as a reason why districts have increased or decreased since 1978 the use of an inclass design for part or all of their programs.

State Influence on Changes in Staffing or Curricula Approaches

Districts receiving the mail survey were asked if they had made substantial changes since 1978 in staffing the Title I program or in the curricula approaches used in their Title I programs.* Over half of the districts indicated no major changes since 1978. Of the remaining districts, 27 percent reported changes in staffing; 13 percent indicated changes in both staffing and curricula approach; and 3 percent said there were changes in curricula approach. Table 8-21 shows the reasons districts gave as being very important or somewhat important for such changes. Only 34 percent of the districts identified state influence ("new state mandates or emphasis") as a very important or somewhat important reason for the changes. The result is that state influence ranks seventh among ten reasons districts gave as being very important or somewhat important for making substantial changes in staffing or curricula approaches since 1978.

*Substantial changes in staffing were defined as (1) significant shifts in the proportion of aides, resource teachers, or teachers, or (2) significant changes in the staff/student ratio. Curricula approaches were defined as including materials or textbook series, educational technology, or skill sequences.

TABLE 8-21

DISTRICT REASONS FOR SUBSTANTIAL CHANGES IN
TITLE I STAFFING OR CURRICULA APPROACH SINCE 1978*

	Percent of Districts Saying This Is A Very Important or Somewhat Important Reason**	
Changes in Title I funding	89	(159)***
Teachers' or Principals' recommendations	71	(120)
Results of formal Title I program evaluation	63	(119)
Data from formal needs surveys	61	(113)
Parents recommendations	60	(113)
Informal assessments of program performance	60	(115)
New district mandates or educational philosophy	48	(116)
Changes in other local programs	41	(107)
New states mandates or emphasis	34	(106)
Demographic changes	18	(99)
Other	44	(25)

*This table displays data from the 43 percent of the districts reporting substantial changes in staffing or curricula since 1978.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

***N for each response is in parentheses.

State Influence as a Constraint on Program Change

Mail survey districts were asked whether, if Title I funding remains the same, there were any features of their Title I programs that should be changed. Seventy-two percent of the districts did not believe any features of their programs should be changed. The remaining 28 percent of the districts noted different aspects of their Title I programs that they would like to change (see Table 8-22), including grade levels served (46 percent), staff composition (41 percent), use of instructional technology (37 percent), pullout vs. inclass design (36 percent) program curricula (27 percent), subject areas (25 percent), and staff-to-pupil ratios (25 percent).

When the districts that want to make changes were asked what (other than lack of funds) stands in the way of change, 45 percent of the districts gave state influence ("state Title I office would be opposed") as a very important or somewhat important barrier to the desired change. However, as Table 8-23 indicates, state influence ranked only fourth (employee unions, parents, and district central office were ranked ahead of state influence) as a perceived constraint on changes that these Title I Directors would like to make in their programs.

TABLE 8-22

ASPECTS OF TITLE I PROGRAM THAT DISTRICT OFFICIALS
WOULD CHANGE ASSUMING THAT THE FUNDING LEVEL REMAINED THE SAME*

	<u>Percent**</u>
Grade level served	46
Staff composition (relative number of teachers, aides, volunteers)	41
Use of instructional technology	37
Pullout v. inclass design	36
Program curriculum	27
Subjects areas covered	25
Staff/pupil ratios	25
Other	16
	<hr style="width: 10%; margin-left: auto; margin-right: 0;"/> (117)

*This table displays data from the 28 percent of the districts reporting aspects of the program they would like to change if funding remained the same.

**Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 8-23

CONSTRAINTS (OTHER THAN LACK OF FUNDS), ON PROGRAM CHANGES AS PERCEIVED BY DISTRICTS THAT WANT TO CHANGE FEATURES OF THEIR TITLE I PROGRAMS*

Reasons for Constraints on Program Changes**	Percent of Districts Saying This Is A Very Important or Somewhat Important Reason	
We are not sure whether the program would still be in compliance if the change(s) were made	52	(82)***
Title I staff would be opposed	50	(75)
School Principals and/or other non-Title I staff would be opposed	49	(80)
State Title I office would be opposed	45	(87)
District central office would be opposed	38	(78)
Parents would be opposed	31	(76)
Employee unions would be opposed	27	(76)
Other	72	(25)

*This table displays data from the 28 percent of the districts reporting aspects of the program they would like to change if funding remained the same.

**Among the types of changes desired were changes in grade levels served, subject areas covered, pullout v. inclass design, staff-to-pupil ratios, staff composition, use of instructional technology and program curricula.

***N for each response is in parentheses.

SUMMARY

In the 1978 Amendments, Congress reorganized and clarified the legal framework for state administration of Title I. The District Practices Study sought to determine how district Title I administrators perceived (1) the manner in which states carried out their administrative functions under Title I; (2) whether there had been any changes since 1978 in how states approved applications, monitored, and provided technical assistance; and (3) the extent of influence State educational agencies had on Title I program changes involving numbers of students served, subject area emphases, the use of pullout and inclass designs, and staffing or curricular approaches, as well as constraints on program change.

Studies done before 1978 found considerable variation in state administrative practices. DPS data show that after 1978 there was variation both among and within states in how districts perceived state administration of Title I and state influence on district practices under Title I.

DPS data support the following general conclusions about Title I state administration and state influence on district implementation of Title I:

- Since the Education Amendments of 1978, which clarified the legal framework for state Title I administration, application approval was reported to have become more rigorous (44 percent); formal on-site monitoring had increased somewhat (22 percent); and the quality or availability of state technical assistance had improved (55 percent).

- The Title I applications of most districts appeared to have been approved by the state without objections about educational ineffectiveness (97 percent); without objections about possible Federal or state regulations (84 percent); and without revisions to the application (73 percent). This may be related to monitoring that included implementation of the program in accordance with the application (89 percent); technical assistance to help with preparation of the district application (71 percent); and increasing familiarity with state expectations over a 15 year period.
- Most districts (78 percent) reported no increase in the frequency of formal on-site monitoring visits by state staff since 1978; a minority of districts (22 percent) said there had been an increase in the frequency of on-site monitoring since 1978. As might have been expected, large and very large districts were monitored more frequently by more monitors than were small and medium districts. Key areas of emphasis during formal on-site monitoring visits included parental involvement (94 percent); student selection (92 percent); evaluation (89 percent); supplement-not-supplant (79 percent); and school attendance area eligibility and targeting (71 percent).
- The majority of districts (68 percent) indicated they received technical assistance from the state and were satisfied with state efforts at technical assistance. However, a significant percentage of districts (32 percent) reported that they did not receive technical assistance from the state.
- Almost two-thirds (64 percent) of the districts said state Title I regulations were not more restrictive than Federal regulations. Yet, there was considerable disagreement within states about whether any state Title I regulations or policies were more restrictive than the Federal regulations.
- Most districts (70 percent) said their Title I program had been included in audits (state, Federal, or both) since 1978; however, some districts (30 percent) reported that their Title I programs had not been included in an audit since 1978. Eighty percent of the districts indicated that Federal auditors examined both financial records and compliance with

Title I regulations; only 70 percent of state auditors did this. Many districts reported making changes in the operation of their Title I programs as the result of audit findings and exceptions.

- Only 26 percent of the districts reporting a substantial change in the number of Title I students served by grade level since 1978 considered state influence a very important or somewhat important reason for substantial changes in the number of Title I students served by grade level since 1978.
- Only 23 percent of the districts indicating a substantial change in subject area emphases of their Title I program said state influence was a very important or somewhat important reason for these changes.
- Forty-six percent of the districts using a pullout design for part or all of their Title I program indicated that state influence was a very important or somewhat important reason for doing so.
- Thirty-four percent of the districts making changes in Title I staffing or curricula approaches since 1978 reported that state influence was a very important or somewhat important reason for those changes.
- Over two-fifths (45 percent) of the districts that would like to change features of their Title I program defined state influence as a very important or somewhat important barrier to desired program changes.

The analysis of state impact did not directly examine the overall degree of state influence or the combined effects of state administrative functions on district practices with respect to school attendance area eligibility and targeting; child eligibility and selection of those in greatest need; and the supplemental character of instructional services for participating children. However, direct questions were asked about the degree of state influence in several collateral areas (number of children served by grade level subject area emphases, pullout



vs. inclass design, staffing or curricula changes, and constraints on program change). With respect to these collateral areas, it appears that the manner in which states administered Title I was not a key influence on district practices in most states and districts.* In a general sense, state educational agencies clearly exerted some influence on districts' implementation of Title I through application approval, monitoring, technical assistance, regulations, and auditing. The perceived degree of state influence often varied from state to state, from district to district, and from program area to program area. It is even possible that the extent of state influence, either direct or indirect, has been underreported, particularly since some state priorities and directions may have become so internalized since 1965 that some districts no longer attribute a particular district practice to state influence.

*An exploratory analysis was conducted on merged data files from the District Practices Study and the Title I State Management Practices Study conducted by American Institutes for Research. This analysis generally confirmed the finding that the manner in which states administered Title I did not appear to be a major influence on district practices. However, it should be noted that the variables developed in either or both studies might not have been sufficiently precise conceptually or operationally to reveal those features of actual state or district activity that would demonstrate a strong linkage between state and local practice. These findings are discussed in a brief Technical Note furnished to the contracting agency.

CHAPTER 9

NONPUBLIC SCHOOL STUDENTS' PARTICIPATION IN TITLE I

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

This chapter presents data from the District Practices Study on the participation of nonpublic students in the Title I program and district practices regarding the planning and operation of Title I projects for these students. These data are reported in light of legal requirements and restrictions on serving such students in the Title I program, findings from earlier studies, data from the Title I program office, and overall public and nonpublic enrollment trends. Some of the questions that directed the inquiry and highlights of the findings are presented below.

- Compared to public school students how did the level of participation for nonpublic students in the Title I program change across time?
 - While the number of nonpublic school students receiving Title I services increased by 4 percent between school years 1976-77 and 1979-80, the number of public school students served by Title I rose by 8.6 percent during this period.
 - Taking into account shifts in the total nonpublic and public enrollment over this period (1977-80), the nonpublic participation rate* in Title I increased by 5.6 percent while the public participation rate increased by 17.9 percent.

*Where "participation rate" is defined as the percent of elementary and secondary enrollment (nonpublic and public respectively) participating in the Title I program.

● What demographic factors were associated with the level of nonpublic participation in Title I projects?

- Nonpublic enrollment in the Title I program was highly correlated with overall nonpublic enrollment, adjusting for regional location and urbanicity.
- There were significant differences across small, medium, and large districts in the percent of districts with nonpublic students residing in Title I attendance areas and the percent of districts serving nonpublic students.

● How did the intensity and quality of Title I instruction for nonpublic students compare to that received by their public school counterparts?

- On average, nonpublic school students spent one-third less time receiving Title I instructions per week than did their public school counterparts.
- The average number of students in Title I classes for nonpublic students was about one-third less than the average number in public Title I classes.
- The average pupil-to-instructor ratio was quite low for both nonpublic and public school students (approximately 4 to 1).
- Title I instructors teaching nonpublic students had, on average, the same number of years of teaching experience as those teaching public school Title I students (approximately 5 years).

● Where did nonpublic students receive their Title I instruction?

- More than 85 percent of Title I districts served nonpublic students at the nonpublic school they attended. Only 2 percent served such students in mobile vans; however, 16 percent of the districts reported serving all or part of the participating nonpublic students in a public school.

● To what extent were the needs of nonpublic students taken into account in designing local Title I projects?

- Fifty-four percent of the nonpublic principals reported having some input into setting student selection criteria and procedures. Only about one-quarter (27) felt they had any influence over which subjects were emphasized. Most nonpublic school

officials interviewed, however, were satisfied with the services received by students in their schools.

- Almost three-fourths (72 percent) of the nonpublic principals interviewed favored the programs focus on providing extra services to students furthest behind in school.

INTRODUCTION

Both Title I, ESEA and Chapter I, IDEA require that eligible nonpublic school students have comparable access to and receive comparable services from the program as do their public school counterparts. This chapter describes the participation of nonpublic students in the Title I program and local district practices in the design and administration of program services for these students.

Following a brief discussion of the legal requirements for nonpublic school students' participation in Title I, a summary of previous research on nonpublic participation, and some methodological problems in studying Title I services provided to nonpublic school students, this chapter presents the findings of the District Practices Study in this area. First, the access of nonpublic students to Title I services is examined. Next, the intensity, quality, and location of those services is discussed. Finally, the question of equal expenditures for public and nonpublic students in Title I is addressed. The chapter concludes with a summary of findings.

SUMMARY OF LEGAL REQUIREMENTS

The 1978 Amendments to Title I of the Elementary and Secondary Education Act of 1965 included several new provisions to address the possibility that students in nonpublic schools were not receiving their fair share of program services. Successive legislation in 1981--Chapter 1 of the Education Consoli-

dation and Improvement Act--contains nearly identical provisions to those in the 1978 Amendments for serving nonpublic students.

Both laws require that, within a district, educationally deprived children who attend nonpublic schools and who live in a Title I/Chapter 1 project area should have the same opportunity to receive federally funded compensatory education services as their public school counterparts, even if such children are attending nonpublic schools outside the project area. Both laws also prescribe that, within a district, expenditures from these programs "shall be equal" for public and nonpublic school students, "taking into account the number of such children to be served and the special educational needs of such children" (§130(a) of Title I and §557(a) of Chapter 1). Finally, both laws stipulate that, if a state or district is prohibited by law or other rulings from serving eligible nonpublic students in the program or has substantially failed to provide such services, the U.S. Secretary of Education may invoke bypass procedures after consultation with appropriate public and nonpublic officials. Under bypass provisions, an independent contractor provides program services to nonpublic students.

Title I regulations and proposed Chapter 1 regulations explicitly stipulate that: (1) program funds are to be used to meet the special educational needs of educationally deprived children in nonpublic schools rather than as general aid in these schools; (2) in conducting the annual needs assessment, a school district must take into account the needs of eligible students in nonpublic schools; and (3) the public school district should

exercise administrative direction and control of the program's funds and property for nonpublic students (§§201.80-201.82 of Title I regulations and Subpart F of 34 CFR Part 76; §§ 200.70-200.75 of proposed Chapter 1 regulations).

PREVIOUS RESEARCH ON NONPUBLIC SCHOOL STUDENTS' PARTICIPATION IN TITLE I

Both national studies of the Title I program that previously investigated the participation of nonpublic students were conducted in the school year before the enactment of the legislative reforms in the Education Amendments of 1978. The Sustaining Effects Study looked only at Title I program in grades 1 through 6. Its brief findings on nonpublic services were derived from a representative survey of only public school officials in 98 Title I districts. Although these data have limitations, they are appropriate for comparison with some of the data collected in the District Practices Study.

The other national analysis of Title I services to nonpublic students was conducted by Thomas Vitullo-Martin for the National Institute of Education's [NIE] Compensatory Education Study. An interim, unpublished report from this substudy concluded that Title I services for nonpublic school students were substantively inferior to those received by public school students. For example, the unpublished report stated that:

Title I classes are larger for nonpublic school students. . . .

Nonpublic school students receive an average of 1 hour of Title I instruction per week (1 percent of the services given public participants). . . .

The least qualified teachers--those with lower degrees, less experience, and part-time status--are typically assigned to nonpublic school students (Vitullo-Martin, 1977, p. i).

NIE's final reports to Congress, however, scarcely mentioned this substudy's findings. Only one of the seven volumes from that study mentioned any substantive findings pertaining to nonpublic students. Referring to the 1976-77 school year, NIE reported that 116,218 nonpublic school students received an average of approximately one hour of Title I instruction per week and that "only 43 percent of Title I districts with nonpublic school students are providing Title I services to any of these pupils." These findings led NIE to conclude that "[m]any school districts apparently have difficulty in delivering compensatory services to nonpublic school children" (1977, p. 14).

METHODOLOGICAL NOTES

Particular attention is placed on the methodology of this study for investigating nonpublic school students' participation in Title I because of the inherent difficulties of researching nonpublic school students' involvement in Federal education programs (see School Management Services, 1981). The District Practices Study used the following data collection strategies to cross-validate findings:

- A mail questionnaire sent to Title I Directors in over 2,000 nationally representative Title I districts.
- Structured interviews and document reviews in 100 nationally representative Title I districts.
- In-depth case studies in 20 specially selected Title I districts.

Both public and nonpublic school Principals, Title I teachers, and regular classroom teachers were interviewed as part of the 100 site visits to a nationally representative sample of districts. During these representative site visits, 94 public and 44 nonpublic regular classroom teachers were interviewed. In addition, documentary and interview data were collected from almost 300 district-level public and nonpublic school officials in these 100 sites.

Data from these sites were used to examine student selection procedures and to compare the services received by public and nonpublic students. To obtain more indepth information about apparent enhancements to and detractions from full participation of nonpublic school students in Title I, 20 specially selected Title I districts were visited for three days by experienced two-person teams. These districts were selected to yield (1) broad geographical representation, (2) a range in size, (3) a variety of examples of effective nonpublic involvement, (4) problems with student participation, and (5) unique approaches for involving nonpublic students. Nominations were received from Title I program officials, state Title I Coordinators, Technical Assistance Center staffs, and nonpublic school organizations.*

*Effective management strategies for enhancing nonpublic school student participation in Chapter 1 programs will be the focus of a report planned for publication by Advanced Technology for the U.S. Department of Education in September 1983.

NONPUBLIC SCHOOL STUDENTS' ACCESS TO TITLE I SERVICES

Districts Offering Title I Services to Nonpublic Students

Nationally, about 25 percent of the Title I districts served nonpublic students in the Title I program. As might be expected, one is more likely to find program services to nonpublic students in larger districts than in small districts. Only 17 percent of small Title I districts served nonpublic students, whereas 44 percent of medium districts and 68 percent of the large Title I districts served nonpublic students.*

More importantly, districts of different size varied in the percent that reported having nonpublic students residing in their Title I attendance areas. Across the country, 45 percent of the Title I districts had nonpublic students residing in Title I attendance areas. However, 33 percent of small districts, 75 percent of medium districts, and 87 percent of large districts with Title I programs reported having nonpublic students living in Title I attendance areas.

Nationwide, fifty-six percent of the Title I districts with nonpublic students residing in Title I attendance areas served such students. Again, there were significant differences across different sized districts. Approximately one-half (49.7 percent) of small districts served nonpublic students; 59 percent of medium and 78 percent of the large districts with nonpublic

*District size is based on total district enrollment derived from Market Data Retrieval File (revised 9/5/80): small = 1-2,499 students; medium = 2,500-9,999 students; large = 10,000 or more students.

students residing in Title I attendance areas served nonpublic students in the Title I program. Even though these variances were observed across different size districts, it is noteworthy that even in large districts, over one-fifth (22 percent) of the Title I districts with nonpublic students residing in Title I attendance areas did not serve nonpublic students in the Title I program. It is also worth noting that the percent of Title I districts serving nonpublic students residing in Title I attendance areas declined from 59 percent to 56 percent between 1978 and 1982.*

A "Participation Rate" Context

As indicated in Table 9-1, over 5 million students, or nearly 11 percent of the total elementary and secondary enrollment in the United States, were enrolled in private elementary and secondary schools during the school year 1979-80. The U.S. Department of Education reported that 192,944 nonpublic school students, or about 3.8 percent of the total nonpublic enrollment, were receiving Title I services in that school year. By

*During the 1976-77 school year, NIE reported that 43 percent of the Title I districts with nonpublic students provided services to any nonpublic students (1977, p. 15). It is important to explain how this percentage differs from those reported here. The District Practices Study asked whether districts with students living in Title I attendance areas but attending nonpublic schools provided Title I services to nonpublic students. About 56 percent of these districts did provide such services. The NIE study may have included districts that did have nonpublic students who lived in a Title I district, but who did not reside in a Title I attendance area. This would have lowered their estimated percentage of districts offering such services. Consequently, it cannot be concluded that there has been a substantial increase in the proportion of districts serving eligible nonpublic students.

comparison, 12.5 percent of the almost 41 million public elementary and secondary students were participating in the Title I program that year.

Comparisons between 1976 and 1979 of public and nonpublic school student participation rates in the Title I program indicate that public school students' access to Title I services increased much more rapidly during this period than did nonpublic students' access to the program. Table 9-2 reveals that, in the 1976-77 school year, 10.6 percent of all elementary and secondary students in public schools participated in Title I. By the 1979-80 school year, the public school student participation rate jumped to 12.5 percent, an increase of almost 18 percent over this four-year period. In comparison, the nonpublic student participation rate grew by less than 6 percent over this same time period. Similarly, while the number of nonpublic Title I students increased by 4 percent from 1976-79, this growth rate was less than half of the increased growth rate for public school students (8.6 percent).

These national trends, however, mask significant differences for nonpublic students' enrollments across geographic regions and for urban and rural districts. Title I nonpublic enrollments were strongly correlated with overall nonpublic enrollment along these dimensions.* For example, in Northeastern central city districts, more than 20 percent of all

*Correlation coefficients of .77 along the urbanicity dimension and .94 along the regional dimension were both statistically significant at $p < .01$.

TABLE 9-1

TOTAL NATIONAL ENROLLMENT IN ELEMENTARY/SECONDARY GRADES
AND TITLE I PARTICIPATION BY PUBLIC/NONPUBLIC SECTORS
FOR SCHOOL YEAR 1979-80

	<u>Enrollment in Elementary/Secondary Schools (1979-80)*</u>	<u>Percent of Total Enrollment</u>	<u>Enrollment in Title I (1979-80)**</u>	<u>Percent of Title I Participants</u>	<u>Percent of Total El/Sec in Title I</u>
Public	40,949,000	89.1	5,099,571	96.4	12.5
Nonpublic	<u>5,028,865</u>	<u>10.9</u>	<u>192,944</u>	<u>3.6</u>	3.8
	45,977,965	100.0	5,292,515	100.0	

*Source: NCES, "A Comparison of Selected Characteristics of Private and Public Schools," mimeographed, 1982, p. 7. While NCES data are viewed to be the most accurate and current information on nonpublic schools in the United States, there may be some reasons to suspect data collection biases which could result in underestimates for nonpublic participation figures (Cooper, 1982).

**Source: U.S. Department of Education tables in "1980 Performance Reports," regular school term, excluding children in local institutions for the neglected or delinquent.

TABLE 9-2

NATIONAL, CROSS-TIME PARTICIPATION RATES FOR
NONPUBLIC AND PUBLIC SCHOOL STUDENTS IN THE
TITLE I PROGRAM

	<u>1976-77</u>	<u>1979-80</u>	<u>Change</u>
Number of nonpublic Title I participants*	185,539	192,994	4% +
Number of nonpublic elementary/secondary students	5,166,858**	5,028,865***	2.7% -
Percent of elemen- tary/secondary nonpublic students in Title I (participation rate)	3.6%	3.8%	5.6% +
Number of public Title I participants*	4,692,098	5,099,571	8.6% +
Number of public elementary/second- ary students	44,317,000**	40,949,000***	7.6% -
Participation rate: percent of elemen- tary/secondary public students in Title I	10.6	12.5	17.9%+

*Source: U.S. Department of Education tables in "1977 Performance Reports" and "1980 Performance Reports," regular school term, excluding children in local institutions for the neglected or delinquent.

**Source: NCES, Private Schools in American Education, 1981.

***Source: NCES, "A Comparison of Selected Characteristics of Private and Public Schools," mimeographed, June 1982.

students attended private schools, whereas in Western nonmetropolitan districts, less than 3 percent of all elementary and secondary students were enrolled in private schools. Similar differences were evident in nonpublic student participation in Title I. That is, in Northeastern central cities, 11.5 percent of the Title I students were in nonpublic schools, whereas in Southern and Western areas, only 1.5 percent of the Title I participants attended nonpublic schools. (See Table 9-3.)

Selection of Nonpublic School Students

Both Title I, ESEA and Chapter 1, ECIA stipulate that, within a district, educationally deprived children residing in eligible attendance areas should have the same opportunity to participate in the program whether they attend public or nonpublic schools. Thus, the DPS asked Title I Directors how they determined whether nonpublic schools within their districts had students living in Title I areas. Specific questions included how they determined which nonpublic schools to contact, in what manner the contact was made, and how nonpublic students were chosen to receive the Title I services. They were also asked whether these procedures had changes over the last three years.

Almost one-fifth of the Title I Directors in districts serving nonpublic students said they contacted only the nonpublic schools located within Title I attendance areas; an equal percentage contacted all the nonpublic schools within the district boundaries, usually because the district makes use of the no wide variance provision (See Table 9-4). Fifteen percent of the Title

TABLE 9-3

PERCENT OF NONPUBLIC ELEMENTARY/SECONDARY ENROLLMENT BY REGION AND METROPOLITAN STATUS: TOTAL AND TITLE I ENROLLMENTS

	<u>Northeast</u>		<u>North Central</u>		<u>South</u>		<u>West</u>	
	Nonpublic Enrollment as a Percent	Nonpublic Title I as a Percent	Nonpublic Enrollment as a Percent	Nonpublic Title I as a Percent	Nonpublic Enrollment as a Percent	Nonpublic Title I as a Percent	Nonpublic Enrollment as a Percent	Nonpublic Title I as a Percent
Central city	20.3	11.5	17.3	6.8	12.4	2.0	14.0	5.7
Urban fringe	10.3	8.3	12.5	5.0	9.4	3.3	7.1	2.1
Nonmetropolitan	7.1	4.5	6.1	4.5	4.2	1.5	2.8	1.5
Regional average	12.5	9.7	11.5	5.8	7.8	1.9	7.9	3.3

*Source: NCES, Conditions of Education: 1981 Edition, p. 62, school year 1979-80.

**Source: Title I District Practices Study, 1981-82 school year.

TABLE 9-4

PROCEDURES USED BY TITLE I SCHOOL DISTRICTS TO DETERMINE
WHETHER NONPUBLIC SCHOOLS HAD STUDENTS WHO LIVED
IN TITLE I SCHOOL ATTENDANCE AREAS

	Percent of Districts Reporting Use of this Procedure <u>1978-79</u>	Percent of Districts Reporting Use of this Procedure <u>1981-82</u>
Questionnaire was sent to all nonpublic schools located in or near the district	13*	13*
Questionnaire was sent to all nonpublic schools located in this district	18	18
Questionnaire was sent to all nonpublic schools in Title I attendance areas in this district	9	9
Questionnaire was sent to only those schools where there were thought to be Title I eligible students	3	3
Phone calls were made to all nonpublic schools located in or near this district	10	10
Phone calls were made to all nonpublic schools located in Title I attendance areas in this district	7	8
Contacts were made to all nonpublic schools located in Title I attendance areas in this district	7	8
Contacts were made with diocesan or central office of nonpublic schools in this district	16	16
Information was used from existing files	22	21
Other procedures	10	12
	<u>(445)**</u>	<u>(445)</u>

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

**Number in parentheses below line in this and all subsequent tables is the number of respondents to this item.

I Directors used a list or directory of nonpublic schools, often compiled by the state educational agency [SEA], to determine which schools to contact. Another 15 percent reported that nonpublic schools with eligible Title I students initiated contact with the district.

Of the districts offering Title I services to nonpublic students, 34 percent reported using multiple methods to contact nonpublic schools. These included telephone, written, and in-person contacts (visits or meetings). Most of the Title I Directors (54 percent) reported using only one of the previously mentioned means of contact, with correspondence being the most frequently used method (30 percent). Other reported means of contact were sending an annual survey to nonpublic officials and publishing information about Title I in local newspapers.

In most (74 percent) of these districts, the nonpublic school provided a list of students and/or addresses, and the district either determined student eligibility or cross-checked decisions made by nonpublic officials. In 21 percent of the districts, nonpublic officials determined which nonpublic students resided in Title I attendance areas. Most districts (95 percent) reported no change in the last three years in their procedures for determining whether nonpublic schools had students who lived in Title I attendance areas.

Districts were also asked about their procedures for selecting nonpublic Title I students. Fifty-one percent reported that they used only standardized tests results for both public

and nonpublic school students. This is a decline from the 65 percent response to a similar question in the Sustaining Effects Study (Wang, 1978, p. 212). Other factors, in descending order, mentioned by the other districts included teacher judgment (62 percent), previous participation in the Title I program (45 percent), limited-English proficiency (37 percent), handicapping conditions (26 percent), and a student's potential for success (22 percent).*

In interviews, over half (53 percent) of the Title I Directors indicated they used the same standardized tests and cutoff scores or criteria for both public and nonpublic school students. Seventeen percent of these Directors reported that the nonpublic school students were tested with different standardized achievement measures and the remaining Directors reported somewhat different procedures for selecting students for testing or weighing of factors for selecting nonpublic school students.

These Title I Directors were also asked to describe the procedures used to assess the needs of students in nonpublic schools. Sixty-one percent of the Directors said that they used the same process for public and nonpublic students, 23 percent reported an essentially different needs assessment process for nonpublic students, and the remaining Directors indicated a similar, but not identical, needs assessment process (e.g., common criteria but different procedures).

*Percentages total to more than 100 percent since more than one response to the question was permitted.

The District Practices Study wanted to discern why eligible nonpublic students were not being served in local school district Title I programs. To answer this question, attempts were made at the 20 case study sites to interview at least one Principal of a nonpublic school in a high poverty area but with no students participating in the Title I program. The results of these inquiries, however, were inconclusive. Sixty-three percent of the nonpublic Principals without Title I served students in the 1981-82 school year who were interviewed did have students participating in previous years. Most of these Principals expressed satisfaction with the services their previously Title I eligible students had received and hoped to regain services in subsequent years for eligible students. These students had lost their eligibility because of demographic shifts within the district or because they did not meet the low-achievement criteria during the 1981-82 school year. Independent schools, even in poverty areas, often had admissions standards that resulted in selection of only high-achieving students and thus had few, if any, Title I eligible students.

Only 7 of the 20 case studies found nonpublic Principals who had decided not to accept Title I services or had not been informed of these services by public school officials. The six Principals who rejected Title I services based their decision on reasons ranging from the beliefs of their denominations to the perception that the quantity or quality of Title I services did not justify the associated administrative encumbrances. One

administrator of a Baptist-supported school, for example, expressed his apprehension about public funds for private schools when he conjectured, "I don't believe the Government is capable of giving money without telling you how to operate your business." Even in this small sample of six Principals, the concern about "strings" associated with accepting public funds was a persistent theme. One Catholic Principal recalled that she had once accepted Federal funds for textbooks and the next year she had to "report the number of minority teachers and the sex of children on sports teams." Another Catholic Principal in a large urban district refused Title I funds because of his reservation about the pedagogical merits of the pullout design "required by Title I."* He also did not have the administrative staff to process the paperwork and believed that Title I teachers required more supervision than the regular teachers in his school.

TITLE I SERVICES TO NONPUBLIC SCHOOL STUDENTS: WITHIN-DISTRICT COMPARISONS TO SERVICES RECEIVED BY PUBLIC SCHOOL STUDENTS

Some Methodological Considerations

In order to obtain descriptions of Title I services to nonpublic students which take into account the within-district comparative standard established in Title I and Chapter 1 legislation, interview and documentary data were collected from both public and nonpublic school officials in 47 sites in a representative sample and 20 specially selected districts. For

*The Title I legal framework did not require the use of a pullout design although some districts required the use of this approach for all Title I Programs.

analyses within districts, data reported by nonpublic officials on services to nonpublic Title I students were compared to similar data collected from public school officials on services to public school students.

The reader, however, should be cautioned against strictly interpreting these comparisons as representing national trends for at least three reasons. First, although the representative site visits were composed of nationally representative districts, only 47 of these districts offered services to nonpublic school students. Second, while the sample was selected to offer a nationally representative portrayal of local Title I district practices, the subsample of these districts offering services to nonpublic students may not have been entirely representative of the districts offering Title I services to such students since this subsample was not drawn from the universe of districts serving nonpublic students. Third, persons interviewed in the nonpublic schools were not selected randomly. Considerations such as staff availability and dependence on public school officials to make contacts with nonpublic schools precluded a random selection of nonpublic school officials.

Summary of Findings

In assessing the Title I services received by nonpublic students, it is important to remember that the Title I legislation required districts to take into account the special educational needs of nonpublic school children. The House Report accompanying the 1978 Title I Amendments expressed the view that these needs could be quite different from those of public school

children (H.R. Rep. 1137, 95th Cong. 2d Sess., p. 32 (1978)). In practice, however, Title I Directors reported that patterns of instructional services rarely differed within a district for nonpublic and public school students in terms of grade levels served, subjects offered, or delivery model used (inclass vs. pullout). Only 9 percent of the mail questionnaire districts offering services to nonpublic school students reported any such differences. Case study data suggest that when services differed, such differences were often attributable to constitutional considerations or other organizational factors. For instance, the presence of religious symbols in regular nonpublic classrooms resulted in the use of only a pullout design for nonpublic school students in one district, even though an inclass approach was used for most of its public school students. Another district's nonpublic school students did not receive Title I math services because its Title I math curriculum did not match that of the Catholic schools attended by Title I eligible students. When grade level differences were observed, they normally reflected the grade level groupings of each sector.

Intensity of Services

Three factors were used to compare, within districts, the intensity of Title I services for nonpublic and public school students: amount of weekly services, class size, and, pupil-to-instructor ratio. Nonpublic school students received 2.63 hours of Title I instruction per week, on average. Their public school counterparts, on the other hand, spent an average of 4.0 hours a week in Title I (see Table 9-5). Nonpublic students, then, spent

one-third less time receiving Title I services than their public school counterparts during a typical week. The case study data suggest that two factors most often lead to less time in Title I for nonpublic students: (1) shorter class periods in nonpublic schools, especially in those having religion classes, and (2) the instructional time lost when the itinerant nonpublic Title I instructors traveled between schools during a class day.

The average number of students in nonpublic Title I classes was 6.4 compared to 9.8 in public schools. The smaller Title I class size in nonpublic schools (34 percent smaller), however, should be viewed in light of differential staffing patterns observed in public and nonpublic Title I classrooms.

Quality of Services

Public Title I classes were often staffed with a certified teacher and an aide. Since staffing patterns were often determined by the number of eligible Title I students at a school, most nonpublic Title I schools qualified for only one part-time or full-time teacher. The pupil-to-instructor ratio was quite low for both public (4.5 to 1) and nonpublic (3.8 to 1) Title I classes.

The Title I instructors assigned to teach nonpublic school students and those teaching public school students had taught, on average, the same number of years in the Title I program, 5.5 years. These Title I instructors were most likely to be certified teachers than instructional aides for both nonpublic and public school students; however, nonpublic school students were

even more likely to have been taught by a certified teacher rather than a instructional aide (see Table 9-5). A common finding of case studies was that, since there was less opportunity for public officials to supervise instructors in the nonpublic Title I classes, certified teachers were preferable for ensuring quality instruction.

Most Principals in both public and nonpublic schools were satisfied with the Title I instructional staff working in their buildings (see Table 9-5). More nonpublic school Principals, however, registered some discontent over their present Title I staff than did public school Principals (16 percent vs. 7 percent).

The prevalence of the pullout design for Title I instruction can create the potential for scheduling and other logistical problems for the regular classroom teacher. Almost one-fourth of the public school classroom teachers reported such problems; 20 percent of the nonpublic teachers registered similar complaints.

The classroom teachers in the nonpublic school reported meeting slightly more frequently with the Title I instructors than did their public school counterparts. For example, 70 percent of the nonpublic Title I instructors vs. 59 percent of the public Title I teachers reported meeting at least once every other week. Such interactions were usually informal. Their of nonpublic schools and the greater homogeneity of staff in these schools.

TABLE 9-5

TITLE I SERVICES TO NONPUBLIC SCHOOL STUDENTS

Weekly Amount of Title I Instruction (Title I instructors--for public school students (87); for nonpublic school students (38))*

<u>X Length of Title I Class Period in Minutes</u>	<u>\bar{X} No. Times/Week</u>		<u>Minutes/Week</u>		<u>Hours/Week</u>
Public 52	4.6	=	239.2	=	3.99
Nonpublic 37.5	4.2	=	157.5	=	2.63

Class Size and Pupil-to-Instructor Ratio (Title I instructors--for public school students (89); for nonpublic school students (38))

What is the average number of students served in a Title I class?

Public \bar{X} = 9.8

Nonpublic \bar{X} = 6.4

On average, how many Title I staff members work with Title I students?

	<u>Public</u>	<u>Nonpublic</u>
\bar{X} Number of teachers	1.2	1.1
\bar{X} Number of aides	1.0	.6

Instructor Experiences and Qualifications (Title I instructor--for public school students (90); for nonpublic school students (38))

How long have you worked in Title I?

Public \bar{X} = 5.5 years

Nonpublic \bar{X} = 5.5 Years

*The category and number of respondents are indicated within the parentheses. Public school officials provided data for public school students; nonpublic school officials or Title I instructors teaching nonpublic students usually provided information on nonpublic students' services.

TABLE 9-5 (cont.)

From whom do most students receive their Title I instruction?

	Percent of regular class- room teachers for public school students	Percent of regular class- room teachers for nonpublic school students
Certified teacher	70	77
Teaching aide/other	30	23
	(89)*	(43)

Does this school have the kind of Title I instructors you want?

	Percent of public school Principals	Percent of nonpublic school Principals
Yes	92	84
No	7	16
	(94)	(43)

Coordination of Title I Instruction with the Regular School Curriculum

Did you have any problem in teaching the Title I students or the rest of the class because of the way Title I instruction was arranged (i.e., scheduling, location)?

	Percent of classroom teachers for public school students	Percent of classroom teachers for nonpublic school students
Yes	24	20
No	76	81
	(85)	(41)

*N for each response is in parenthesis.

TABLE 9-5 (cont.)

On average, how often do you meet with the regular classroom teacher to coordinate instruction?

	<u>Percent of Title I instructors for public school students</u>	<u>Percent of Title I instructors for public school students</u>
Daily	17	22
Once or twice a week	42	48
Once or twice a month	22	19
Less than every other month	9	5
	<hr/>	<hr/>
	(88)*	(38)

*N for each response is in parentheses.

Location of Services

Both the Sustaining Effects Study (school year 1976-77) and the District Practices Study (school year 1981-82) asked district-level Title I officials about the location of Title I instruction for nonpublic school students. Differences between these two studies in sample design (i.e., grades 1-6 for SES vs. Pre K-12 for DPS) and response categories, as well as small sample sizes, preclude definitive generalization about cross-time trends; however, it is worth comparing the data from these two studies.

As indicated in Table 9-6, 91 percent of the Title I districts in the SES sample reported serving nonpublic school students at a nonpublic school; only 83 percent of the DPS mail questionnaire districts reported serving nonpublic students in nonpublic schools. On the other hand, only 10 percent of the districts in the SES sample indicated providing services to Title I nonpublic students in public schools in comparison to 16 percent of the districts in the DPS sample.

In approximately 22 percent of the districts in the DPS mail questionnaire sample, some portion of the nonpublic students received their Title I instruction at a place other than the nonpublic schools they attended during the regular school year. The alternative site was most frequently the public school but this public school site was usually used for nonpublic students' receipt of remedial summer school instruction. In at least four states, however, at least half of the Title I districts served

TABLE 9-6

SITE OF DISTRICT DELIVERY OF TITLE I SERVICES
TO NONPUBLIC SCHOOL STUDENTS: A COMPARISON OF DATA FROM
THE SUSTAINING EFFECTS AND DISTRICT PRACTICES STUDIES

	<u>SES (1976-77)**</u>	<u>DPS (1981-82)</u>
At nonpublic schools	91	83
At public schools	10	16
In mobile vans	3	2
At neutral sites	-	4
Other	3	0
	<hr style="width: 50%; margin: 0 auto;"/> (98)	<hr style="width: 50%; margin: 0 auto;"/> (114)

*Percentages do not total to 100 percent since more than one response to the question was permitted.

**Source: Wang, Ming-mei, et al. "Table 3-31: Site of District Delivery of Services to Students Attending Non-public Schools (Based on 98 Title I Districts), The Nature and Recipients of Compensatory Education, Report #5, Sustaining Effects Study (Santa Monica, CA: System Development Corporation), 1978, p. 68. The SES study used the site categories of "At non-public school," "Public elementary school," "Mobile facility," and "Site other than school including community center."

nonpublic Title I students in the public school during the regular school term. This was usually motivated by constitutions, laws, or legal interpretations that prohibited public school staff from teaching in the nonpublic schools.

Districts rarely used neutral sites or mobile vans to accommodate these state-imposed restrictions. Nationwide, four percent of the districts served at least some of their nonpublic Title I students at neutral sites and even fewer districts (two percent) used mobile vans.

In discussing where nonpublic school students received Title I services, special attention must be paid to Missouri and Virginia, which served most nonpublic school children in Title I programs under the bypass provision. In these two states, local districts are effectively prohibited from serving eligible nonpublic students because of state constitutional prohibitions. Thus, Title I services were provided through an independent contractor in each of these states rather than through local school districts.

According to U.S. Department of Education figures, 3,452 nonpublic school students in Missouri and 734 nonpublic school students in Virginia received Title I services in the 1979-80 school year, representing 2.2 percent of the total Title I nonpublic school students (ED, 1982). Nationwide, 3.6 percent of all Title I students were enrolled in nonpublic schools during that school year. Missouri's percent of nonpublic Title I students (3.9 percent) was slightly above this national average,

whereas Virginia's less than one percent (.7 percent) was significantly lower than the national average.

Several factors contributed to the lower number and percentage of nonpublic Title I students in Virginia. The total private elementary/secondary enrollment in Missouri was 40 percent larger than in Virginia in 1980 (130,302 vs. 76,084) even though total elementary/secondary enrollments (public and private) in these two states were roughly comparable (974,950 vs. 1,086,455, respectively). In addition, while over three-quarters (76.1 percent) of the elementary/secondary private school students in Missouri attended Catholic schools, less than one-third (30.3 percent) of Virginia's nonpublic elementary/secondary students were enrolled in Catholic schools (NCES, 1982, pp. 7 and 8). A preponderance of Virginia's nonpublic students attended either religiously affiliated schools with policies of not accepting Federal funds and or nonaffiliated private schools selecting students with average or above average academic achievement.

According to U.S. Department of Education data, nonpublic school student enrollment in the Title I program increased 26 percent between school years 1976-77 and 1979-80. During the same four-year period, Virginia's nonpublic school student enrollment jumped from 35 to 734 students. National nonpublic school student enrollment in Title I increased only by 4 percent during this period (ED, 1982).

THE QUESTION OF "EQUAL EXPENDITURES"

Both Title I and Chapter 1 require that a district's Title I expenditure for eligible nonpublic students "shall be equal" to that received by their public school counterparts, taking into account the number of eligible children and their special educational needs.

Neither law nor regulations, however, require that districts record or report per pupil expenditures or disaggregate expenditures according to public and nonpublic enrollments. Thus, per-pupil expenditure data are difficult to collect from districts. Even when available, such figures are difficult to interpret, in part because districts use widely varying accounting methods and costing assumptions due to variances of cost-of-living standards. Breaking down per pupil estimates into public and nonpublic per pupil expenditures further confounds analyses and interpretations.

Given the emphasis of the Title I and Chapter 1 requirements on per pupil expenditures, but considering the attendant methodological problems, the DPS attempted to collect per pupil expenditure estimates for public and nonpublic students only at 20 case study sites. Thus, from the start these budget data likely reflected the biases associated with the nomination criteria (discussed in the methodology section of this chapter).

Expenditure data were obtained from 16 of the 20 districts. However, the methods used to derive these estimates varied widely. Three of these districts kept detailed, separate records

for their public and nonpublic expenditures. Even in these districts, no attempt had been made to determine overhead costs such as the preparation of the budget, application, and evaluation for public and nonpublic school students. Most districts, without these separate public and nonpublic accounts derived estimates through various expenditure models. Still others made only "best guess estimates."* Thus, the data should be interpreted cautiously.

The data, despite their limitations, result from a systematic process to collect participation and expenditure data for public and nonpublic comparisons within districts. Table 9-7 portrays the diverse patterns of participation and funding of nonpublic students. To protect the district's identity, district names are not presented; however, a three-part descriptor identifies the district by its geographical region, metropolitan status, and total enrollment. The districts are ranked by the ratio of nonpublic to public per pupil expenditure within a district (Column VIII). An estimated value of 1.0 for this factor would indicate parity between nonpublic and public expenditures; less than 1.0, a lower estimate for nonpublic per pupil expenditures; greater than 1.0, a higher per pupil expenditure estimate for nonpublic students.

*Upon completion of a preliminary analysis of the participant and expenditure data from these sites, follow-up phone calls were made to some of the visited sites to check particularly high or low estimates of per pupil expenditure.

TABLE 9-7

NONPUBLIC CASE STUDY PER PUPIL EXPENDITURE COMPARISONS
1981-82 SCHOOL YEAR (N=20)

	I	II	III	IV	V	VI	VII	VIII
	1981-82 Title I Budget Total (including carry over) (in thousands)	1981-82--Nonpublic Budget (in thousands)	1981-82--Public Budget (in thousands)	Nonpublic School Students Receiving Title I (unduplicated)	Public School Students Receiving Title I (unduplicated)	Nonpublic Per Pupil Expenditure Estimates	Public Per Pupil Expenditure Estimates	Nonpublic Per Pupil Expenditure Factor Estimates
1. Northeast/ Central City/Large	* >13,000	>1,700	* >12,000	* >1,500	* >15,000	\$606	\$324	1.87
2. West Urban Fringe/Large	5,000+	300	4,700	** 660	** 18,500	455	254	1.79
3. Northeast/ Central City/Large	7,900	1,500	6,600	1,212	8,931	1201	726	1.65
4. Northeast/ Urban Fringe/Medium	300	40	300	32	350	1188	789	1.51
5. Northeast/ Central City/Large	2,500	300	2,200	** 600	5,872	495	370	1.34
6. West/ Central City/Medium	1,100	15	1,100	26	1,910	615	591	1.04
7. West/ Central City/Large	5,100	45	5,100	** 70	7,008	643	723	.89
8. West/ Central City/Large	8,600	1,100	7,600	2,915	17,625	376	430	.87
9. Northeast/ Central City/Medium	700	160	600	297	881	549	653	.84
10. West/ Central City/Large	3,200	250	3,000	428	4,228	575	689	.83

Table 9-7 (cont.)

	I	II	III	IV	V	VI	VII	VIII
	1981-82 Title I Budget Total (including carry over) (in thousands)	1981-82--Nonpublic Budget (in thousands)	1981-82--Public Budget (in thousands)	Nonpublic School Students Receiving Title I (unduplicated)	Public School Students Receiving Title I (unduplicated)	Nonpublic Per Pupil Expenditure Estimates	Public Per Pupil Expenditure Estimates	Nonpublic Per Pupil Expenditure Factor Estimates
11. North Central/ Central City/Large	900	70	800	129	1,200	535	673	.79
12. North Central/ Non-metro/Medium	200	30	200	64	** 300	484	670	.72
13. Northeast/ Central City/Large	11,300	1,700	9,600	** 3,000	** 12,000	565	800	.70
14. Northeast/ Central City/Medium	200	50	200	140	294	350	554	.63
15. South/ Central City/Large	**** 12,400	600	11,800	1,337	14,291	455	826	.55
16. North Central/ Central City/Medium	700	30	700	133	746	226	849	.27
17. North Central/ Central City/Large			12,900	1,455	20,680		623	
18. North Central/ Central City/Large	10,000			1,571	11,079			
19. North Central/ Central City/Large	*** 6,900	N/A	N/A	742	5,578			
20. North Central/ Urban Fringe/Medium	400	N/A	N/A	10	428			

*Estimates were obtained from this district, but to protect its identity, only the calculations based on these estimates are provided. For all other districts, expenditure estimates have been rounded to two significant digits to protect the identities of these districts. Actual estimates, however, were used in the calculations.

**Estimates

***Includes concentration grant

****Does not include carryover

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Among the 16 districts, the nonpublic per pupil expenditure factor ranged from 1.87 (District 1) to a low of .27 (District 16). That is, in District 1, nonpublic students received 87 percent more Title I funds, on average, than their public school counterparts. On the other hand, nonpublic Title I students in District 16 received about one-fourth of the dollars received by public school Title I students, on average. Overall, districts with smaller Title I budgets (less than \$90,000) tended to have lower nonpublic per pupil expenditure ratios.

The dominant aspect of the array is the diversity both of nonpublic/public allocation patterns and of participation levels. For instance, 1 out of every 4 Title I students in District 13 was a nonpublic student, whereas only 1 out of 100 Title I participants attended a nonpublic school in District 6. Even though this district had the lowest nonpublic participation level, its estimated nonpublic per pupil expenditure factor shows an almost equal expenditure, on average, between nonpublic and public school students.

In order to determine if districts had changed the proportion of their Title I budget spent on nonpublic students, Title I Directors were asked about any changes in their allocation of Title I resources between 1978 and 1981. About 9 percent of the Directors reported an increase of at least 10 percent; on the other hand, 8 percent reported a decline of this magnitude. The preponderance of districts offering Title I services to nonpublic

students reported less than a 10 percent change in either direction (see Table 9-8).

The Title I/Chapter 1 legal framework does not contain provisions requiring districts to report expenditures disaggregated by public and nonpublic schools. Even if districts kept records permitting within-district public and nonpublic per pupil cost comparisons, other factors would confound assessments of whether nonpublic students were receiving their fair share of the Title I budget, according to the legislative yardstick. The legislation specifies that, in addition to the number of students, districts should consider the special needs of nonpublic students, which conceivably could be quite different from the needs of public school students within a district.

To determine the extent to which nonpublic school students' needs were being taken into account in designing Title I programs, nonpublic school Principals in the case study sample with students served by Title I were asked (1) whether nonpublic officials provided substantive input into decisions about student selection criteria, grades served, program design model used (e.g., pullout vs. inclass), and which subjects were emphasized in the Title I program, and (2) whether their comments made much of a difference in the kinds of services nonpublic students received. Just over one half of the nonpublic Principals (54 percent) had any say over student selection criteria and about one-quarter (27 percent) influenced which subjects were emphasized (27 percent).

TABLE 9-8

PERCENT OF TITLE I DIRECTORS REPORTING CHANGES IN THE LEVEL OF TITLE I SERVICES TO
NONPUBLIC STUDENTS IN RELATION TO TOTAL SERVICES BETWEEN 1978 AND 1981

	<u>Percent of Small Districts</u>	<u>Percent of Medium Districts</u>	<u>Percent of Large Districts</u>	<u>Percent of Total Districts</u>
Changed less than 10%	42	39	62	48
Increased by at least 10%	7.7	0	21	9
Decreased by at least 10%	0	9	14	8
No Title I program for nonpublic students	50	52	3	35
				(88)

*These percentages when compared to other data from the study suggest that some districts without Title I programs for nonpublic students probably indicated a change of less than 10 percent for this question.

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Nonpublic dioceses or districts with staff who insisted on having some say in these matters were more than twice as likely to have a different mix of services from those in the public school Title I program. In general, however, reluctance, indifference, or resignation about these matters reigned among nonpublic school administrators. One nun's observation, "We're just glad to get the help we do," reflected a prevalent attitude in visited sites.

The main complaints of nonpublic school officials had less to do with the level of services provided than with the processes or rules governing such decisions. High on nonpublic school officials' complaint list was the statutory prohibition against providing services to nonpublic students living outside Title I attendance areas (29 percent of nonpublic Principals interviewed). Paperwork and other administrative burdens were also a frequent source of nonpublic school officials' dissatisfaction with Title I (21 percent of the nonpublic Principals interviewed). The most prevalent complaint lodged against local Title I administrators was that they did not involve nonpublic administrators in key program design, staffing, or allocation decisions (32 percent of nonpublic Principals interviewed).

On the other hand, almost three-fourths (72 percent) of the nonpublic Principals interviewed saw a benefit in the program's focus on providing supplementary services to students furthest behind in school. Over half of the nonpublic Principals (56 percent) felt that the special design features of the program

(e.g., qualified staff, small group or individual instruction, remedial materials) contributed to increased academic progress for students served by Title I.

SUMMARY

From a national perspective, the overall participation level of nonpublic school students over the last four years has, at best, been in a steady state, although several indicators point to a relative marginal decline in nonpublic students' access to Title I services. For example, when viewing changes in Title I nonpublic and public enrollments in light of overall nonpublic and public enrollment patterns between 1976 and 1980, the nonpublic participation rate in Title I increased by less than 6 percent, while public participation in Title I increased by almost 18 percent during that period. Also, the proportion of Title I districts serving nonpublic students residing in Title I attendance areas declined from 59 percent in 1978 to 56 percent in 1981.

At least three factors appear to be closely associated with the participation level of nonpublic students in the Title I program: overall nonpublic enrollment patterns, district size, and states' constitutions and laws. Also, both philosophical (e.g., separation of church and state) and practical (e.g., too much paperwork) reasons were given by nonpublic Principals who chose not to participate in Title I. However, data from this study are not sufficient to completely explain why some eligible nonpublic students are not receiving Title I services.

For nonpublic school students receiving Title I services, several patterns emerged from within-district analyses of District Practices Study data concerning the intensity, quality, and location of their services: (1) their Title I classes were shorter; (2) their class size was smaller; (3) their Title I instruction might be better coordinated with their regular classes; (4) their pupil-to-instructor ratio was slightly lower; (5) the Title I instructors of nonpublic Title I students had, on average, the same amount of teaching experience as their public school counterparts, and nonpublic school students were even more likely than public school students to be taught by a certified teacher rather than an instructional aide; and (6) while most nonpublic students received Title I services in their nonpublic schools, more than one-fifth of the districts served some portion of their nonpublic students at another location.

Nonpublic students residing states with constitutional or legal limitations for serving nonpublic students, and not in one of the two bypass states, were likely to have less comparable services than nonpublic students residing in states without such rulings. In a sizeable number of these districts, nonpublic students were taught outside the nonpublic schools, most frequently in the public schools.

CHAPTER 10

LOCAL TITLE I EVALUATION AND TECHNICAL ASSISTANCE

GUIDING QUESTIONS AND HIGHLIGHTS OF STUDY FINDINGS

Local Title I evaluation and technical assistance were not thoroughly investigated by the District Practices Study because several recent studies have closely examined these areas. At the same time, the DPS did ask local Title I personnel about evaluations and technical assistance, and the specific questions that guided that inquiry together with related findings are highlighted below.

- How valuable are required evaluations to local Title I Directors?
 - In an open-ended question, 15 percent of Title I Directors said that evaluation requirements should be kept to ensure that "the essence of the program is not lost."
 - Seven percent of Title I Directors ranked evaluation, testing, and needs assessment among the best features of the 1978 law; five percent ranked them among the worst features.
- How burdensome and necessary are Title I evaluations?
 - Title I Directors ranked evaluation as relatively burdensome but also as relatively necessary to the management of the program.
- How useful are Title I evaluations to local decision-makers?
 - Overall, larger districts seemed to find Title I evaluations more useful than smaller districts.
 - Directors ranked evaluations as fourth in importance (behind funding levels, teachers' or Principals' recommendations, and needs assessments) for making changes in the number of children served at each grade level.

- Twenty-five percent of those Directors who changed the relative emphasis placed on different subject areas reported that evaluation results influenced their decisions.
- Eighty-six percent of those making changes in Title I curriculum found evaluations to be helpful.

● How much help do states and Technical Assistance Centers give to local school districts on evaluation?

- Sixty-four percent of the Title I Directors who received assistance from state officials received help with their Title I evaluations.
- Twenty-six percent of Title I Directors mentioned that Technical Assistance Centers were helpful in meeting evaluation requirements.

INTRODUCTION

After a short review of the legislative history of evaluation in Title I and Chapter 1, the study's findings on evaluation are presented. The findings are grouped into four topics: general comments on the value of evaluation, the burden of evaluation, uses of evaluation results, and interactions with state Title I offices and Technical Assistance Centers [TACs].

SUMMARY OF LEGAL REQUIREMENTS

Evaluation requirements have been part of Title I since the original version of the Elementary and Secondary Education Act in 1965. At that time, the law required local projects to ensure that "effective procedures, including provisions for appropriate objective measurements of education, will be adopted for evaluation at least annually of the effectiveness of the programs in meeting the special educational needs of educationally deprived children" (P.L. 89-10, §205).

Debate over the 1974 Amendments to ESEA revealed some congressional interest in increasing the specificity of the evaluation requirements so that the results of more uniform local evaluations could be aggregated at the state and national levels. This led the U.S. Office of Education to develop and disseminate a set of models for acceptable local evaluations and to set up a network of Technical Assistance Centers to help the states and districts with evaluation.

In 1978, Title I regulations required districts to use one of the models. Districts were required to assess every 3 years

the gains made by Title I students over at least a 12 month period. In addition, the 1978 Amendments required for the first time that evaluation results be used in local program planning:

Chapter 1 of ECIA retained the spirit of former evaluation requirements, although much of the detail has been removed from the law and regulations. Local projects must be evaluated, the evaluations must include objective measures of achievement in the basic skills, and gains over periods of more than one year must be measured.

REPORT OF FINDINGS

General Comments on the Value of Evaluation

Since the 1978 Amendments imposed a fairly elaborate set of evaluation requirements on school districts, information on the perceived necessity and value of local evaluation is of interest. The general verdict from Title I Directors was positive, although they were quite aware of the demands that the requirements placed on them.

Several open-ended questions in the representative interviews and mail questionnaires elicited mention of evaluation as a valued part of the Title I legal framework. Table 10-1 shows that 15 percent of the 100 Title I Directors interviewed said that evaluation requirements should be kept in place "so that the essence of the program is not lost." Table 10-2 shows that some Directors ranked evaluation (including testing and needs assessment) fifth among the "best features of the 1978 Title I law and regulations," excluding from the rankings the very general

TABLE 10-1

PERCEIVED REQUIREMENTS NEEDED TO
KEEP THE ESSENCE OF TITLE I

	<u>Percent*</u>
Keep student selection guidelines (e.g., selection of those in greatest need)	68
Keep using poverty measures to determine eligible attendance areas and schools	44
Keep supplement-not-supplant and excess costs provisions	30
Keep DAC/SAC or its equivalent	29
Keep evaluation requirements	15
Keep Title I categorical	13
Keep accountability provisions	12
Keep programs focused on basic skills	9
Keep comparability requirements	7
Keep noninstructional duties provision	5
Keep local control and flexibility	5
Other--e.g., keep SEA monitoring, keep application procedures (all less than 5%)	17
	<u>(96)**</u>

*Data are based on representative interviews with 100 Title I Directors. Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

**The number in parentheses below the line in this and all subsequent tables is the number of respondents to this item.

TABLE 10-2

PERCEIVED BEST AND WORST FEATURES OF THE 1978
LAW AND REGULATIONS

<u>Best Features</u>	<u>Percent*</u>
Provides funds/services for disadvantaged students	37
Provisions for selecting eligible school attendance areas and students	8
Funds allocation provisions (e.g., supplement-not-supplant, comparability)	8
Requirements concerning School and District Advisory Councils	8
Paperwork problem reduced	7
Evaluation/testing/needs assessment	7
Requirements provide sufficient flexibility to meet needs	5
Others--e.g., no best feature; individualized instruction (all less than 3%)	21
	<hr style="width: 10%; margin: auto;"/> (906)
<u>Worst Features</u>	
Declining dollars	23
Requirements concerning School and District Advisory Councils	23
Red tape/paperwork	20
Comparability	7
Regulations need more flexibility	6
School and student selection requirements	5
Evaluation/testing	5
Supplement-not-supplant and excess costs	4
Maintenance of effort	3
Others--e.g., too many requirements, too much state control or problems with SEA (all less than 4%)	22
	<hr style="width: 10%; margin: auto;"/> (961)

*Percentages do not total to 100 percent since more than one response to the question was permitted.

comments about providing funds and services for disadvantaged children. A smaller percentage of Directors (5 percent) ranked evaluation requirements among the "worst features" of the law and regulations.

Burden and Necessity

To provide further information on opinions about evaluation and other requirements, Title I Directors responding to the mail questionnaire were asked to rate the burden and the importance of the major provisions of the 1978 law. They ranked each on scales from 1 to 10 with 1 representing the most burdensome and the most necessary provisions and 10 the least burdensome and least necessary provisions. Table 10-3 shows that Title I Directors ranked evaluation requirements high on both scales. That is, Directors believed that evaluations were important for attaining the objectives of Title I programs despite the burden and paperwork involved in complying with the requirement.

Examining these findings more closely reveals that burden and necessity of evaluation differed for districts of different size. As one might expect, compliance with evaluation requirements was most burdensome for small districts (see Table 10-4). In such districts, which had fewer than 2500 children, the responsibility for meeting Title I evaluation requirements often fell to the Title I Director. The Title I Directors, Principals, and Title I teachers in these districts often spent proportionately more time on evaluation than did their counterparts in larger districts. In addition, Directors in small districts

TABLE 10-3

BURDEN AND NECESSITY RATINGS OF TITLE I LEGAL
AND REGULATORY PROVISIONS

	<u>Necessity*</u>	<u>Burden*</u>
Ranking and selecting students	1.7	5.2
Evaluation procedures	3.5	4.2
Ranking and selecting project areas	4.2	6.1
Adequate size, scope, and quality provisions	4.8	6.3
Parent involvement	5.5	3.8
Supplement-not-supplant provisions	5.5	5.5
Maintenance of effort provisions	6.5	5.5
Comparability provisions	7.3	5.0
Excess costs requirements	7.5	5.9
Complaint resolution procedures	7.7	6.4

*Provisions were ranked from 1 to 10 on necessity and burden with 1 being most necessary and most burdensome.

TABLE 10-4

PERCEIVED BURDEN AND NECESSITY OF TITLE I EVALUATION
REQUIREMENTS IN SMALL, MEDIUM, AND LARGE DISTRICTS

	<u>District Size*</u>		
	<u>Small</u>	<u>Medium</u>	<u>Large</u>
Necessity**	3.4	3.6	3.9
Burden**	4.0	4.6	4.6
Director's time spent on evaluation	13%	11%	11%
	<hr/>	<hr/>	<hr/>
	(742)	(602)	(315)

*Small districts had fewer than 2,500 children; medium districts had between 2,500 and 9,999 children; large districts had at least 10,000 children.

**Title I legal and regulatory provisions, including evaluation, were ranked from 1 to 10 on necessity and burden.

often had non-Title I responsibilities. In some districts, they were Principals of Title I schools or even Title I teachers. The burden of evaluation requirements appeared to be less in the view of Directors in larger districts, where they might have employed professional evaluators to assume much of the burden of Title I evaluation. Somewhat unexpectedly, despite the relatively greater burden and time required for evaluations in small districts, Title I Directors in smaller districts reported that Title I evaluations were relatively more important to accomplishing their program goals.

Uses of Evaluation Results

Data from the District Practices Study permitted an assessment of the extent to which evaluation results were used in local program planning. Again, the findings were generally positive. The results of local evaluations often played a significant role in program decisions, although surveys of opinion within the district tended to be somewhat more important in reaching these decisions and funding levels generally exercised the greatest influence.

One type of program decision influenced by evaluation results was the amount of service provided at each grade level. Thirty-three percent of districts had changed the distribution of services among grades. In districts reporting such changes, Title I Directors ranked changes in Title I funding levels as the dominant reason, but results of formal Title I program evaluations ranked fourth, behind teachers' or Principals' recommen-

dations and data from formal needs surveys (see Table 10-5). When asked specifically about the reasons for serving secondary school students, Title I Directors gave the use of formal data an even higher relative ranking, although it should be noted that this response category included needs assessments as well as evaluations (see Table 10-6).

Twenty-two percent of the districts changed the relative emphasis placed on different subject areas (e.g., reading, mathematics, language arts). Of those districts, about one-quarter reported that evaluation results were a factor in the decision. Again, as Table 10-7 shows, funding levels, needs surveys, and teachers' or Principals' recommendations ranked ahead of evaluation.

Title I Directors also reported that evaluation results helped them make changes in Title I staffing and curriculum. Table 10-8 shows that evaluations were less important in making staff changes than for changing curriculum. Thirty percent of the districts making significant staff changes found evaluations to be very important. Although many fewer districts made major changes in their Title I curriculums, evaluations appeared to be more helpful in making these decisions than in making staffing changes. Eighty-six percent of those that made curriculum alterations found evaluation results to be at least somewhat helpful. Regarding the specific curriculum change to increase or decrease the use of the pullout design in Title I classrooms, 56 percent of the districts changing their emphasis on pullout found evaluation results to be useful.

TABLE 10-5

REASONS FOR CHANGING TITLE I SERVICES TO GRADES

<u>Reasons</u>	<u>Percent*</u>
Changes in Title I funding level	50
Data from formal needs surveys	30
Teachers' or Principals' recommendations	30
Results of formal Title I program evaluations	25
Demographic changes	20
New state mandates or emphases	16
New district mandates or educational philosophy	15
Changes in other local programs	14
Informal assessments of program performance	13
Other	11
	(145)

*Percentages in this column do not total to 100 percent since more than one response to the question was permitted. A maximum of five reasons for change was included for each district.

TABLE 10-6

REASONS WHY DISTRICTS DECIDED TO
HAVE TITLE I SERVICES ABOVE ELEMENTARY GRADES

<u>Reasons</u>	<u>Percent*</u>
Formal data (needs assessments, evaluation, tests)	31
Serve as many needy students as possible	20
Had the money available	19
Have always done it; decision made long ago	19
To provide continuity of service	15
Parents wanted it	14
School personnel wanted it	12
Emphasis of state Title I office	12
Informal judgment	12
Grade span of schools (grades 1-8)	11
District office staff wanted it	8
Institution of minimum competency requirements	8
Other--e.g., school board decision, demographic changes (all less than 5%)	12
	<hr/>
	(65)

*Based on data from representative site interviews. Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 10-7

REASONS FOR CHANGES IN EMPHASIS
IN TITLE I SUBJECT AREAS

<u>Reasons</u>	<u>Percent*</u>
Changes in Title I funding	44
Data from formal needs surveys	41
Teachers' or Principals' recommendations	38
Results of formal Title I program evaluations	27
Parents' recommendations	26
New state mandates or emphases	24
New district mandates or educational philosophy	20
Informal assessments of program performance	18
Changes in other local programs	14
Demographic changes	4
Other	3
	<hr/>
	(95)

*Data are based on responses to the mail questionnaire. Percentages in this column do not total to 100 percent since more than one response to the question was permitted.

TABLE 10-8

IMPORTANCE OF EVALUATION RESULTS FOR
MAKING CHANGES IN TITLE I
STAFF AND CURRICULUMPercent of Districts Indicating Importance
Of Evaluation Results

<u>Type of Change</u>	<u>Very Important</u>	<u>Somewhat Important</u>	<u>Not Important</u>
Title I staff	16	14	70
Title I curriculum	53	33	13
Both staff and curriculum	35	26	38

Evidence on how districts use Title I evaluations bears out Directors' comments on the overall importance of evaluation requirements. In the aggregate, 39 percent of all districts reported that evaluation results helped them make decisions about changes in services to grades, Title I subjects, Title I staffing, Title I curriculum, or some combination of these Title I components.

It is also noteworthy that the use of evaluation results seemed to vary across districts with different characteristics. One important difference was whether districts experienced Title I budget increases or decreases between 1978 and 1982. One might argue that more difficult decisions must be made during periods of decline than when budgets increase. As districts reduced services to Title I children, dropped services to some Title I schools, and laid off Title I teachers, local administrators would turn to evaluations and other "objective" data to help them make hard decisions, or so the argument goes. Others would maintain that in times of retrenchment, decisions become more "political," and evaluations are less useful. The District Practices Study provided no unequivocal evidence on either side of this issue, but Table 10-9 reports some tantalizing results. Districts experiencing budget decreases of 10 percent or more and districts with level funding (which indicates real decline because of inflation) seemed to have found evaluation results somewhat more useful than districts with Title I budgets that increased by 10 percent or more between 1978 and 1982. However, the differences are slight (7 percentage points).

TABLE 10-9

USE OF TITLE I EVALUATIONS IN DISTRICTS
WITH DIFFERENT BUDGET CHANGES
BETWEEN 1978-79 AND 1981-82

	<u>Budget Change</u>		
	<u>Decreased By At Least 10 Percent</u>	<u>Little or No Change</u>	<u>Increased By At Least 10 Percent</u>
Yes	42%	41%	35%
No	58%	59%	65%
	<hr/>	<hr/>	<hr/>
	(114)	(151)	(179)

Another interesting finding is the use of Title I evaluations in districts of different size. Table 10-10 shows that large districts (with at least 10,000 children) were most likely to use evaluations to help them make Title I decisions. Small districts reported using evaluations less than either medium or large districts. This finding makes some sense when one recalls that large districts are more able to afford professional evaluators, who can assist Directors and others in using evaluation results. Smaller districts may strive only to comply with evaluation requirements and may find results less useful overall.

This is, of course, somewhat at odds with the finding that small districts (more than medium and large districts) reported evaluation requirements to be necessary to accomplish the purposes of Title I. One possibility is that small districts used evaluations more to justify their participation in Title I, whereas medium and especially large districts found evaluations to be more useful in making Title I program decisions. Another explanation is that some small districts may have confused terminology and included student selection procedures in what they termed evaluation.

Interactions with State Title I Offices and TACs

) Since the congressional mandate in the 1978 Amendments included the state and Federal obligation to monitor and help districts with their evaluations, it is worth discussing briefly what monitoring and assistance Directors reported in the area of

TABLE 10-10

USE OF TITLE I EVALUATIONS IN
SMALL, MEDIUM, AND LARGE DISTRICTS

	<u>District Size</u>		
	<u>Small</u>	<u>Medium</u>	<u>Large</u>
Yes	35%	42%	49%
No	65%	58%	51%
	<u>(196)</u>	<u>(157)</u>	<u>(91)</u>

evaluation? Apparently evaluation was seldom a bone of contention when states reviewed local Title I applications. Less than 2 percent of districts reported that their state Title I offices objected to the evaluation segment of their Title I applications. However, this is an area in which state regulations and policies were sometimes perceived to be more restrictive than those of the Federal government (although it should be noted that only a small percentage of directors found any state regulations or policies more restrictive). Seventeen percent of districts reported that some state policy or regulation was more restrictive than Federal Title I regulations, and 7 percent of Title I Directors specifically said that their state's evaluation policies were more restrictive than Federal regulations. Table 10-11, which lists results from states with at least three districts responding, shows that there can be significant difference of opinion within states about the SEA's added restrictions.

Districts also reported that state Title I offices were helpful in developing and improving local Title I evaluations. Nearly 70 percent of districts said that SEAs had helped them in some way. Of that group of districts, 64 percent said that SEAs helped with their evaluations. Again, as Table 10-12 indicates, Title I Directors in the same state sometimes differed in their views of the SEA's helpfulness with evaluation.

Another major source of help in performing Title I evaluations is the Title I Technical Assistance Centers [TACs]. Previously located in 10 regions of the country, the TACs were

TABLE 10-11

TITLE I DIRECTORS' PERCEPTIONS OF ADDED
RESTRICTIONS IN STATE TITLE I EVALUATION POLICIES*

State Rules Are More Restrictive:

<u>State</u>	<u>Yes</u>	<u>No</u>
1	7	6
2	1	2
3	0	3
4	2	3
5	4	5
6	1	3
7	8	4
8	2	2
9	1	2

*Results are only reported for states with three or more districts responding to the question.

TABLE 10-12

LOCAL TITLE I DIRECTORS' PERCEPTIONS OF STATES' HELPFULNESS IN MEETING EVALUATION REQUIREMENTS*

States Help:

<u>State</u>	<u>Yes</u>	<u>No</u>
1	6	1
2	11	10
3	5	2
4	6	3
5	6	6
6	2	6
7	4	2
8	6	1
9	3	3
10	6	9
11	5	3
12	4	2
13	3	3
14	4	7
15	11	10
16	11	5
17	4	1
18	4	2
19	9	2
20	5	0
21	5	2
22	10	6
23	5	2
24	4	3
25	5	0
26	5	1

*Results are only reported for states with five or more districts responding to the question.

mandated to assist states and local districts in implementing and using Title I evaluations. Twenty-six percent of districts reported that TACs were helpful in administering their Title I programs. Thus TAC personnel rank only behind state Title I officials in helping districts with their evaluations. Despite the favorable response toward the TACs, opinions about TACs' usefulness varied among types of districts and across regions. As Table 10-13 shows, Title I Directors in medium and large districts perceived TACs to be more helpful than Directors in small districts.

Table 10-14 indicates that districts in different regions viewed the helpfulness of TACs differently. Although there might have been extenuating circumstances, it appears that some TACs were viewed more positively than others. For example, 51 percent of districts in Region III, which included some mid-Atlantic states and Virginia, reported that the TAC in their region helped them with evaluations. At the other end of the scale, only 6 percent of the districts in Region VII cited the TAC as helpful.

SUMMARY

Findings from this study indicate that evaluation in Title I was largely living up to the intentions of its advocates: it was called a worthwhile function by local Title I Directors; it was used (although it was not the most critical factor) in making

TABLE 10-13

PERCENT OF SMALL, MEDIUM, AND LARGE
DISTRICTS REPORTING THAT TACs WERE HELPFUL

Percent Indicating TAC Was Helpful:

<u>Size</u>	<u>Yes</u>	<u>No</u>	<u>N</u>
Small	19	81	195
Medium	34	66	157
Large	29	71	90

TABLE 10-14

PERCENT OF DISTRICTS IN EACH
REGION REPORTING THAT TACs WERE HELPFUL

Percent Indicating TAC Was Helpful:

<u>Region</u>	<u>Yes</u>	<u>No</u>	<u>N</u>
I	32	68	38
II	26	74	39
III	51	49	39
IV	44	56	48
V	15	85	92
VI	30	70	61
VII	6	94	34
VIII	27	73	26
IX	14	86	44
X	33	67	21

local program decisions; and technical assistance for evaluation was available. The following reviews the findings:

- Title I Directors often rated evaluation as "necessary" or "crucial" to achieving the program's goals.
- Directors also considered evaluation "burdensome," and some judged it "unproductive."
- The results of local evaluations often played a significant role in local program decisions, although surveys of opinion within the district tended to play a larger role still. Evaluation was of some importance in decisions about grade levels to be served, subjects to be emphasized, staffing, curriculum, and the use of pullout designs.
- Title I Directors in districts experiencing level funding or budget decreases seemed to find evaluation results somewhat more useful.
- Compared to their counterparts in smaller districts, Title I Directors in larger districts found evaluations more useful.
- Although some Directors believed their states' regulations or policies on evaluation were stricter than those of the Federal government, the states rarely criticized local evaluation designs in reviewing applications.
- State Title I offices often helped districts with their evaluations. (This may help account for the finding above; the states may have offered enough assistance to forestall possible problems before local applications were submitted.)
- The Technical Assistance Centers were another source of help, although some TACs were viewed as more helpful than others, and larger districts found the TAC assistance more useful than smaller ones.

APPENDIX

APPENDIX

STUDY DESIGN FOR PHASES I AND II

INTRODUCTION

This appendix presents an overview of the study design for Phases I and II of the Title I District Practices Study. It is intended to make clear the various sources of the data that are reported in this volume so that the reader can make informed judgments as to the validity of findings and analyses. The following sections summarize the development of the objectives of the study, describe the sampling design utilized, give a chronology of the instrument development and field testing, and describe the data collection procedures. These sections are supplemented with other materials to help the reader interpret the analyses that were conducted. Readers interested in research methodology and the logistics of data collection will also find this material informative.

DEVELOPMENT OF STUDY OBJECTIVES AND METHODOLOGIES

Several activities were initiated immediately after contract award in an effort to refine the study's objectives and the research questions that the study was intended to address. Congressional officials were interviewed and documents were reviewed to gather the available information on program implementation and the likely effects of the new legislation and regulations. An Advisory Panel was established to review and refine study objectives. Research questions were developed based on this input and related to appropriate data collection methodologies. In the

following sections of this chapter, each of these steps is discussed in more detail.

Document Review

The first major task undertaken during the Title I District Practices Study [DPS] was a review of relevant background materials. The review was performed as a precondition to the refinement of study objectives and subsequent development of instrumentation. Documents reviewed included the following:

- Pre-1978 Title I statutes and regulations
- The Title I law (P.L. 95-561 and the technical amendments, P.L. 96-46)
- The General Education Provisions Act and the EDGAR regulations
- The Conference Report (H.R. Report Number 95-1753)
- The House Report (H.R. Report Number 95-1137)
- The Senate Report (S. Report Number 95-856)
- House and Senate Hearings preceding reauthorization of Title I
- Reports submitted to Congress from the National Institute of Education [NIE] Compensatory Education Study (e.g., Evaluating Compensatory Education: An Interim Report on the NIE Compensatory Education Study; Administration of Compensatory Education; Title I Funds Allocation: The Current Formula; Demonstration Studies of Funds Allocation in Districts; The Effects of Services on Student Development; Using Achievement Test Scores to Allocate Title I Funds)
- Both sets of proposed Title I regulations (June 29, 1979 and June 11, 1980)
- A complete set of the reports from the Title I Legal Standards Project undertaken for NIE by the Lawyers' Committee for Civil Rights under Law
- Reports prepared by other NIE contractors for the Compensatory Education Study (e.g., The Instructional

Dimensions Study: A Comparative Analysis of ESEA,
Title I Administration in Eight States; Title I ESEA
Sub-county Allocation Study)

- Analyses of Title I undertaken since the 1978 Amendments (e.g., A Policy Maker's Guide to Title I of the Elementary and Secondary Education Act and Its Relationship to State and Local Special Programs; The Office of Education Administers Changes in a Law: Agency Response to Title I, ESEA Amendments of 1978; An Analysis of the Impact of the Proposed Reorganization and Consolidation Demonstration Project (S. Report Number 1780) on Title I of the Elementary and Secondary Act of 1965)

As an integral part of this review, we used textual comparisons of the existing law, regulations, and legislative history of Title I.

Advisory Panel

The second major task was the formation of an Advisory Panel. The Title I DPS Advisory Panel consisted of 18 members. Four of the persons were from state education agencies, nine were from school districts, and five were from research organizations or universities. Advisory Panel members were:

Elise Ax
Clark County School District
Las Vegas, Nevada

Lillian Barna
San Jose Unified School
District
San Jose, California

Rosie Doughty
University City Public Schools
University City, Missouri

Richard Duffy
U.S. Catholic Conference
Washington, D.C.

William Grant
State Board of Education
Springfield, Illinois

Clarence Morris
Arkansas Department of Education
Little Rock, Arkansas

Cynthia Peacock
Benson, North Carolina

Leonel Rosales
Brownsville Independent School
District
Brownsville, Texas

Paul Rost
Albuquerque School District
Albuquerque, New Mexico

Jim Sanders
Western Michigan University
Kalamazoo, Michigan

Paul Hill
The Rand Corporation
Washington, D.C.

Louis Monacel
Detroit Public Schools
Detroit, Michigan

Mary Kennedy
The Huron Institute
Cambridge, Massachusetts

Barbara Wylder
School District 81
Spokane, Washington

Michael Kirst
Stanford University
Stanford, California

Eugene Ymiolak
Hillsboro County School District
Tampa, Florida

Robert Marley
North Carolina Department of
Instruction
Raleigh, North Carolina

Phil Zarlengo
Rhode Island Department of
Education
Providence, Rhode Island

The first meeting of the Advisory Panel was convened on January 22-23, 1981. Substantial guidance was received regarding policy issues and questions that the study should address. The Advisory Panel also met on January 28-29, 1982 to review preliminary findings, to discuss possible special report topics, and to consider any follow-up to initial data collection activities. A third Advisory Panel meeting took place June 17-18, 1982 to review study findings, provide feedback on the study reports, and give guidance for Phase III of the study.

Refinement of Study Objectives and Research Questions

A third major preliminary activity was the refinement of study objectives. Research questions for the DPS were developed and continually refined throughout Phase I of the study. Initial refinement was based upon review of relevant literature and legislation. Subsequent refinement occurred through conversations with organizations active in Title I legislative deliberations and informal contacts with colleagues in the field.

In November 1980, interviews were conducted with 24 persons in the Title I program office, the U.S. Department of Education's [ED] Office of Planning and Budget, and the School Finance Project. These interviews provided critical information for identifying the predominant concerns of program management and for isolating key local management issues.

In December 1980, interviews were conducted with 10 persons in ED's Office of Legislation, the Office of the Assistant Secretary for Nonpublic Education, and the National Advisory Council on the Education of Disadvantaged Children. These interviews further clarified likely reauthorization issues as well as aided in the refinement of study objectives and research questions.

In January 1981, eight secondary, nonpublic, and school-wide projects were visited in order to further familiarize project staff with Title I issues at the district level. Research questions and preliminary instruments were examined and subsequently refined to capture the expected impacts of Chapter 1 of the Education Consolidation and Improvement Act [ECIA] of 1981. This final refinement of the content of data collection instruments enabled the study to gather certain baseline data for comparisons between the existing Title I law and similar provisions in ECIA, the extent of Title I Directors' knowledge of ECIA, and their initial reactions to the Act's relative strengths and shortcomings.

The fundamental goal of this study was to provide policymakers with systematic descriptions and analyses to inform their

decisions concerning the regulatory or statutory changes intended to improve compensatory education services funded by the Federal government for educationally deprived children. The two refined study objectives were:

- To describe how local school districts implemented Title I, ESEA under the 1978 legal framework as a baseline depiction for comparisons to local implementation under Chapter 1, ECIA
- To document local educators' rationales for program decisions, their perceptions of the problems and benefits of existing Title I requirements, and their assessments of expected effects of Chapter 1, ECIA on school districts' implementation of Title I

The focus of the first study objective shifted from an emphasis on assessing the impacts of the 1978 Amendments on local implementation to describing program operations under the 1978 legal framework as a baseline for comparing local operation of Title I under Chapter 1, ECIA. In certain areas of special interest, however, data were collected to permit comparisons of the periods prior to and after the implementation of the 1978 Amendments. These areas of special interest included administrative reporting and paperwork burden, attendance area and student selection procedures, and types of services provided with Title I funds. Additional areas covered for cross-time comparisons included basic descriptive information about the number of schools and students served, grade level and subject area emphases, and funds allocation decisions.

The second research objective was also refined to reflect the current policy context. The study provides detailed

assessments from local administrators of the expected effects of Chapter 1, ECIA requirements on local practices.

The two study objectives differ primarily in their focus, but cover similar substance. The first study objective seeks to uncover the more objective detailing of current activities at the district level. The second study objective focuses more on the subjective perceptions of key school officials, their rationales for making specific program decisions, the problems and benefits of existing provisions, and the practices they expect school districts to implement under ECIA over the next several years.

Relating Research Questions to Data Collection Methodologies

The research questions for each study objective are presented in Figure A-1. Three categories of data were required to address these research questions:

- Data describing current district practices
- Retrospective data for cross-time comparisons (school years 1978-79 to 1981-82)
- Prospective data for assessing the possible effects of legislative and fiscal changes

The specific current practices described elsewhere in this report are summarized under Research Questions 1-3 for Study Objective I. They include, for instance, school and student targeting procedures, procedures for complying with fiscal management requirements, program design and staffing patterns, and participation data. A part of this description relates (through statistical and qualitative analyses) the current practices, procedures, and participation data to other district characteristics

STUDY OBJECTIVES AND RESEARCH QUESTIONS

STUDY OBJECTIVE I:

To describe how local school districts implement Title I, ESEA under the 1978 legal framework as a baseline depiction for comparison with local implementation under Chapter 1, ECLA.

RESEARCH QUESTIONS

1. What is the current incidence of a broad range of Title I practices in school districts throughout the country? These Title I practices concern:
 - Targeting of Title I funds to certain attendance areas or schools
 - Identification and selection of Title I students
 - Fiscal management requirements
 - Program design and staffing patterns
 - Parental involvement, especially in the planning, implementation, and evaluation of Title I projects
 - Coordination among programs
2. What amount and kind of Title I services are provided to nonpublic school students and have these changed since 1978?
3. How do state and Federal requirements and activities affect the management and reporting practices of local school districts operating Title I programs?

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FIGURE A-1 (cont.)

STUDY OBJECTIVE II: To document local educators' rationales for program decisions, their perceptions of the problems and benefits of existing Title I requirements, and their assessments of expected effects of Chapter 1, ECIA on school districts' implementation of Title I

RESEARCH QUESTIONS

1. In the following specific areas, why did school districts choose their present policies and practices and not others? What do local officials perceive as major problems and benefits of these procedures?
 - Targeting of Title I funds to certain attendance areas or schools
 - Identification and selection of Title I students
 - Fiscal management requirements
 - Program design and staffing patterns
 - Parent involvement, especially in the planning, implementation, and evaluation of Title I projects
 - Coordination among programs
2. According to public and nonpublic school officials, why did school districts choose their present policies and practices and not others for nonpublic involvement? What do they perceive as the major problems and benefits of these procedures? What changes do they believe should be made?
3. What are local program directors' perceptions of strengths and weaknesses in state management practices?
4. What changes do school district officials expect under ECIA and for which requirements do local program administrators seek additional clarification?

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such as enrollment, grades served, geographic location, size of budget, or state influence variables.

Cross-time analyses (1978-79 to 1981-82) involve statistical comparisons of grade levels served, subject areas emphasized, and district level allocation priorities (instructional, auxiliary, and administrative expenditures). The rationales for and the possible determinants of these observed trends are also assessed.

In a more prospective vein, the study collected data which shed light on the anticipated effects of legislative changes in Chapter 1, ECIA and on fiscal cutbacks to Title I. Although local programs under Chapter 1, ECIA were first implemented in the 1982-83 school year, key interviewees were queried in the 1981-82 school year about the possible effects of changes in ECIA in their districts, provisions in the new law for which further clarifications might be useful, and assessments of the strengths and weaknesses of the new law.

Four methods of collecting data were employed, each designed to produce a greater depth of understanding of the issues under study. The broadest coverage was provided by a mail survey sent to more than 2,000 school districts. This survey used fixed alternative responses and asked for data on the frequency of events and counts of participants. This instrument would permit, for example, a description of changes in the allocation of Title I funds across budget categories and allow these changes to be related to changes in program characteristics. However, the findings from this instrument would not inform policymakers about

the decision-making process that led to the changes, nor indicate the rationale(s) supporting the decisions that were made. These could be very important in predicting the consequences of further changes in legislation or funding levels.

To provide this information, a sample of 100 districts was visited for the purpose of conducting in-depth structured interviews that probed the decision-making process and its rationale(s). These data provided rich descriptive detail about the decision-making process that buttressed the findings from the survey. The interview instruments touched the same areas as the mail surveys, but provided more opportunities for the respondents to answer in their own terms rather than make forced choices. Instructions to the interviewers to probe for details ensured that complete responses were obtained.

Even this methodology would not provide fully sufficient data about the nature of all administrative practices, however. There were some areas in which there was too little prior guidance in the form of earlier studies or other information for us to know with certainty what line of inquiry would be most fruitful. To gather information about these areas, and to provide validation of the other methods of data collection, case studies (2 data collectors on-site for one week) were conducted using our most experienced staff to obtain as complete a description as possible of the functioning of the Title I program in 20 districts.

In addition, 20 districts were visited for two days to obtain greater detail about the operation of Title I programs for nonpublic students. This data collection effort was more structured than the case studies of administrative practices, but required that the data collectors follow up ambiguous leads and probe sensitively for details. Taken together, these four data collection strategies provided the study with the breadth and depth of coverage to support the findings and resulted in the highest quality of information for policymakers.

SAMPLING DESIGN FOR THE STUDY'S THREE SAMPLES

Three samples were selected for the Title I District Practices Study. The first sample, consisting of 2,205 Title I Directors in representative school districts, received a mail questionnaire. The second sample consisted of 100 representative school districts that were visited by project staff (the interview sample). The third sample consisted of 40 school districts where special purpose case studies were conducted to examine (1) nonpublic involvement in Title I and (2) local administration of Title I.

Mail Questionnaire Sample

The sampling frame for the mail questionnaire was constructed using the Market Data Retrieval [MDR] tape, which contained the most comprehensive (100 percent coverage of public school districts) and most current (updated to September 1980) listing of school districts.

Three stratification variables were employed for categorizing school districts prior to selection: district size, district location, and Orshansky poverty level.

Three categories for district size were employed: fewer than 2,500 students (small); 2,500-9,999 students (medium); and 10,000 or more students (large). Our strategy was to optimize the design by allocating sample sizes to each of the three size categories to equalize the variance of the estimates derived from each of the separate size groups. Larger sample sizes were used for the two smallest size categories to offset the effect of smaller sampling fractions in these strata. The final sample size for the small stratum was 915; for the medium stratum, 745; and for the large stratum, 380 school districts. In addition, we selected with certainty the 60 largest districts in the United States.

Within each of the three district size groupings, school districts were categorized along an urbanicity dimension as central city, urban fringe, or nonmetropolitan districts. Districts were also separated into one of three categories using the third stratification variable, the Orshansky poverty level: districts with 25 percent or more of students below the poverty level, districts with 12-24 percent of students below the poverty level, and districts with fewer than 12 percent of students below the poverty level.

Since not all school districts have Title I programs, sample size was augmented to reflect expected proportions in each size

stratum of districts with Title I programs.* The overall selection process resulted in the selection of 2,305 school districts. From this pool, 100 school districts with Title I programs were selected systematically for the interview sample, leaving 2,205 school districts for the mail questionnaire sample (see Table A-1). Of these remaining districts, 149 did not have Title I programs.

This resulted in a sampling frame of 2,056 Title I school districts for the mail questionnaire sample. The final response rate from Title I districts receiving a mail questionnaire was 87.2 percent, resulting in an actual respondent sample size of 1,793 school districts.

Interview Sample

A sample of 100 school districts was chosen from the original pool of 2,305 described in the previous section. These 100 districts were selected with probability methods so as to result in roughly equal numbers in each of the groupings. Interviews were conducted with the district's Title I Director, Coordinator of Instruction, Special Education Director, and the Bilingual/ESL Director in each of these districts which employed such administrators on a full or part-time basis. The chairperson of the District Advisory Council and at least one member of a School Advisory Council were also interviewed in each district in this

*Sample sizes were augmented based upon data from a fast response survey of "School Districts Participating in Multiple Federal Programs" published by NCES (Fast Response Survey Report No. 7) in 1979.

TABLE A-1

SAMPLE SELECTION AND STRATIFICATION BY DISTRICT SIZE
FOR THE MAIL SURVEY AND INTERVIEW SAMPLES

<u>District Size Stratum</u>	<u>Number of Districts From MDR Tape</u>	<u>Sample Selection</u>	<u>Augmented Sample</u>	<u>Interview Sample</u>	<u>Mail Survey Sample</u>
Small (fewer than 2,500 students)	11,396	915	1,089	31	1,058
Medium (2,500-9,999 students)	3,182	745	760	33	727
Large (10,000+ students)	620	380	396	11	385
Certainty (Among 60 largest districts)	60	60	60	25	35
TOTAL	15,258	2,100	2,305	100	2,205

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sample. Depending on the size of the district and the time allocated to a specific visit, at least two Title I schools were also visited. School visits entailed interviews with the Principal, one Title I instructor, and one regular classroom teacher. Both teachers were randomly selected.

Sample for Case Studies on Local Administration

Selection of the districts for the local administration case studies was based primarily on the questions we intended to examine in the case studies. The three substantive issues we wished to explore in these case studies were:

- Interactions between district and school-level personnel in the implementation of Title I projects
- Effects of changing resources on local administration of Title I
- Effects of multiple categorical programs on district and school administration of Title I

To maximize the information obtained about these issues, we used a two-stage strategy to select sites. First, states were identified based on the following criteria:

- Percentage decline in Title I allocations from 1980-81 to 1981-82
- State per pupil expenditures for the handicapped
- Experts' recommendations on states' handicapped effort
- Existence of funded state bilingual programs
- Existence of funded state compensatory education programs
- Experts' estimates of the state educational agency [SEA] control of, or involvement in, local Title I administration

The second stage involved purposively sampling school districts from selected states based on the following criteria:

- SEA recommendations
- Ratio of 1981-82 funds allocations to 1980-81 allocations
- Number of handicapped children served
- Number of limited-English-proficient [LEP] children served
- Number of minority children
- Total students
- Number of schools

The last two criteria--number of students and number of schools--resulted more from practical concerns than from substantive issues. Most of the sites selected for our special case studies were districts with medium or large enrollments (20,000 to 50,000 students). We believed that districts of this size would yield richer data about local Title I administration than smaller districts in which district-school interactions were less complex. Moreover, it was feasible to do a case study of a district of this size in one week--the time we had allocated; it would have been difficult to obtain comprehensive descriptions of extremely large districts in that amount of time. Thus, we believe that our two-stage purposive sampling plan provided us with 20 sites with a high probability of yielding important information on district-school administration of Title I and that were of a manageable size for one-week site visits.

Sample for Case Studies on Nonpublic Involvement

Twenty districts were selected as sites for case studies examining nonpublic involvement in Title I. These districts were recommended by a number of sources including state Title I Coordinators, U.S. Department of Education officials, and representatives from nonpublic education organizations. Districts were selected on the basis of (1) broad geographical representation, (2) a range in size, and (3) reputations for a particularly effective nonpublic involvement, problems with such participation, or unique approaches to involving nonpublic students.

Given the limited existing information on nonpublic involvement in Title I, the diversity of state laws and local practices, and the complexity of nonpublic and public interactions, decisions were made on a site-by-site basis about the individuals to be interviewed, the questions to be asked, and other forms of data to be reported in the write-up of each case study.

In general, however, the respondents included:

- Title I Director
- Nonpublic school system official
- Principal from one or two nonpublic and public schools with Title I students
- Principal from one or two nonpublic schools without Title I

The nonpublic school system officials were knowledgeable persons from the nonpublic school sector with the highest participation rate in the district's Title I program, usually the

Catholic school system. However, in districts with large numbers of non-Catholic school children in nonpublic schools, a knowledgeable person from that sector was also interviewed. Principals representing schools without Title I were selected from nonpublic schools in public school attendance areas with the highest concentration of low-income families.

INSTRUMENT DEVELOPMENT

A set of 18 instruments was developed for the DPS. Included were four forms of the mail questionnaire; 9 interview instruments that were used to collect data from respondents at the 100 representative school districts; and a group of interview instruments that was employed in the special-purpose case studies. A list of the instruments is presented in Figure A-2.

These instruments were developed in consultation with officials from the ED's Planning and Evaluation Service, Title I program officials, and the study's Advisory Panel. To avoid needless duplication, we carefully reviewed existing data sources and previous studies of Title I's administration. We also discussed the objectives and scope of this study with program officials and the staff of previous Title I studies to ensure that relevant issues were addressed in the instrumentation and that cross-time comparisons would be possible.

The study's instrumentation was initially pretested in four districts during January 1981. Sites selected for pretests

FIGURE A-2
LIST OF INSTRUMENTS

I. Interview Sample

Title I Director
Coordinator of Instructional Component
Special Education Director
Bilingual/ESL Director
DAC Chairperson/Member
SAC Chairperson/Member
Principal
Title I Instructor
Regular Classroom Teacher

II. Mail Questionnaire

Form A Core, School Selection, Student Selection, Program Design and Staffing
Form B Core, Parent Involvement, Instructional Services
Form C Core, Fiscal Management, Nonpublic Involvement
Form D Core, Interaction with State Title I Office, Audits and Complaint Resolution

III. Nonpublic Case Study

Title I Director
Nonpublic School System Official
Principal of Nonpublic School with Title I Students
Principal of Nonpublic School without Title I Students

IV. Local Administration Case Study

Fieldworker Guide



represented a variety of geographic locations, district sizes, and grades served. The pretests provided information on:

- Feasibility of the instruments to collect the desired data
- Appropriateness of items to measure the desired phenomenon
- Improvements to the formatting of the instruments
- Actual administration time required for purposes of estimating respondent burden

A second round of formal pretest visits to five districts was conducted in late February 1981 that incorporated revisions to the draft instruments based on the first pretest. During both rounds of pretesting, a broad range of local Title I officials (e.g., Directors, Principals, teachers, Parent Advisory Council members) were queried to ensure that all major administrative issues were addressed. The pretesting also provided guidance concerning possible relationships among state, district, and school level variables.

Instrumentation for the Mail Questionnaire

A matrix sampling approach was utilized to reduce respondent burden on the Title I Directors receiving the mail questionnaire. There was a core set of 34 items asked of all respondents. These items addressed the fundamental purposes of the Title I legislation and were identified as crucial baseline data to inform major policy issues: number of students served by grade level, number of schools served, financial data, and assessments of the best and worst features of the current law and the likely effects of ECIA.

The remaining pool of 103 items was divided into 4 groups of conceptually related items. No more than 67 questions were contained in any version of the questionnaire.

In addition to the core questions, Form A of the mail questionnaire contained questions regarding three related subjects--targeting, student selection, and program design and staffing. When school district officials planned their Title I programs, they often had to make simultaneous decisions about the number of schools or attendance areas served, the number of students receiving Title I services in these schools, and the grade level(s) and content area(s) emphasized in their Title I programs. The grouping of the questions in this form of the mail questionnaire reflected those interdependent decisions at the local level. In addition, Chapter 1, ECIA changes some key aspects of these requirements in the Title I, ESEA law. This group of respondents, therefore, was also asked to make informed judgments about the possible effects of changes in the new Chapter 1 law on targeting and student selection procedures over the next several years.

Form B of the mail questionnaire was composed of questions regarding two related subjects--parental involvement and instructional services. The Title I legislation stipulated that parents, through school and district-level advisory councils, should be involved in the design, implementation, and assessment of Title I programs. Federal policymakers also requested information about other factors that contributed to the instructional

programs offered by school districts with Title I funds. By grouping these two types of questions, we expected a more coherent picture of the multiple forces affecting local decision makers' rationales for their existing programs and changes in their decision processes. This group of respondents was also asked to reflect on how parental involvement might change over the next several years in their districts under the Chapter 1, ECIA legislation which eliminates the mandatory Parent Advisory Council requirements.

Form C of the Mail Questionnaire was composed of two sets of distinct items. The first set of questions dealt with fiscal requirements such as comparability and maintenance of effort. Since the new Chapter 1, ECIA alters these provisions, respondents in these groups made informed judgments about possible impacts of these new provisions. The second set of questions dealt with services to nonpublic students.

Form D of the Mail Questionnaire contained questions on the interactions between local school districts and the state Title I office, as well as on the related topics of auditing and complaint resolution. Grouping these sets of items provided comprehensive information on the state's role in application approval, monitoring, and technical assistance as perceived by local Title I officials, as well as possible relationships between perceptions and reported practices in the areas of auditing and complaint resolution.

Instrumentation for the Interview Sample

The instrumentation for the interview sample consisted of a nine-part package of interview protocols (see Figure A-2). The basic issues addressed in these interview protocols were those in the mail questionnaire; however, the content varied to reflect the diverse perspectives, experiences, and responsibilities of each respondent group. The interview also permitted probing questions not possible in the mail questionnaire. Accordingly, the interview instruments focused on eliciting rationales for relationships among various local decisions and practices in implementing Title I.

Instrumentation for Case Studies on Local Administration

The instrument for the case studies on local administration of Title I was a Fieldworker Guide. The Fieldworker Guide was divided into seven sections:

- Environment of the Title I program
- School selection and resource allocation
- Student selection
- Program design
- Influence of other special programs
- Influences on district-school interactions
- Vignette of the district Title I program

Each of the first five sections was made up of five or six questions which the fieldworkers answered after examining Title I documents and interviewing district personnel. For each of these questions, the guide provided suggestions on which documents to

review, which people to interview, and what strategies to use to answer the questions. Since circumstances varied from site to site, the precise questions fieldworkers asked district respondents could not be specified in advance. The case study instrument was aimed at standardizing data collection as much as possible so that cross-site comparisons and analyses would be possible while allowing for variations from site to site and for detection of serendipitous findings. The fieldworkers made final decisions on documents, respondents, and strategies based on what they learned about the Title I programs in the districts they visited. The sixth section--influences on local interactions--stated several hypotheses for the fieldworker to assess. The seventh section asked the fieldworker to write a vignette of the program which summarized the salient characteristics and issues related to Title I in that district.

Instrumentation for Case Studies on Nonpublic Involvement

Both the mail questionnaire and representative interview samples provided survey information on participation rates of nonpublic school students and other data describing Title I programs for students attending nonpublic schools. To augment these broad descriptions, this study explored possible barriers to nonpublic school participation and ways in which districts have overcome these barriers.

In general, questions in the nonpublic interview protocol were far more open-ended than in the interview sample instruments and relied more extensively on probes for each question when

appropriate. Other forms of evidence examined in the nonpublic case studies included:

- Relevant correspondence between the public school system and nonpublic schools relating to Title I
- State laws pertaining to serving students in nonpublic schools with public funds
- Relevant state guidelines or other technical assistance materials on serving nonpublic school students in the Title I program

FIELD OPERATIONS FOR REPRESENTATIVE AND SPECIAL PURPOSE SITE VISIT SAMPLES

Communication with Participants

After 100 districts had been randomly selected for the interview sample, a planned series of communications were initiated with each district and state Title I office. The nature and sequencing of those communications are indicated below:

- (1) State Title I Directors were phoned and informed of the study and of those districts within the state that had been selected for visitation.
- (2) Written verification of (1) above was provided to all states.
- (3) District Title I Directors were phoned and informed of the study. Their voluntary participation was sought at this time, and general information about the district was requested.
- (4) Written verification of (3) above was provided to all sites. A letter was sent to the district Superintendent, the district Title I Coordinator/Director, and the state Title I Director.
- (5) Phone calls were made to the Title I Director, to arrange the dates of the scheduled visit, the schools to be visited, the teachers to be interviewed, and other appropriate details of the visit. These calls were made at least three weeks prior to actual visits.

- (6) Written verification of all details agreed to in (5) was provided to the district.
- (7) Introductory calls by interviewers to the districts were made two days prior to the scheduled site visit and served to confirm the interview schedule and other data collection/travel arrangements.
- (8) Thank you calls were made from Advanced Technology to each district after the completion of the visit.
- (9) Thank you letters were sent to each district after the completion of the visit.

Communication with special purpose sites proceeded in much the same fashion as described above. Due to the relatively less structured protocols for the special purpose sites, however, more attention was focused on determining the particular people to be interviewed at each site. All special purpose sites were also sent thank you letters and additional informational material when requested.

Selection and Training of Data Collectors

Twelve interviewers were selected to complement the permanent Advanced Technology Title I staff in conducting site visits and case studies. Candidates were recruited through advertisements in newspapers and newsletters, contacts with other research organizations, and suggestions offered by several state and local Title I Directors.

Over 120 applications were received as a result of the recruitment effort. After reviewing these applications, senior DPS project staff interviewed the 40 most highly qualified candidates by phone. Two references were contacted for each candidate. Based upon this series of interviews and recommendations,

22 individuals were invited to face-to-face interviews with project staff. Twelve finalists were then selected.

The 12 interviewers were mailed training materials shortly after selection. A series of study questions were sent along with the study materials to guide the interviewers in their preparatory review. Interviewers were asked to respond to these questions and mail them back to Advanced Technology. The responses helped identify areas which deserved more in-depth coverage during the formal training.

The training agenda focused on the statutory and regulatory provisions of Title I and changes to these provisions in Chapter 1, ECIA, the use of data collection instruments, and the development of enhanced interviewing skills.

Each interviewer was given a training manual which contained essential information on interviewing techniques, procedures for recording data, confidentiality and respondent rights, field editing and reporting, and travel procedures.

Each interviewer was also given a Question-by-Question Specifications Manual. This manual contained the full set of interview instruments with notes explaining any intricacies surrounding individual questions. Many of the annotations served to highlight the similarities and differences between existing Title I requirements and those in ECIA. Such explicit comparisons indicated to the interviewer those items which merited a full discussion of pending changes in certain program features affecting implementation at the local level. These manuals were used extensively during the training sessions.

The major topical areas addressed in the training were targeting, student selection, fiscal management, program design, and staffing, multiple program issues, state interaction and audits, and local administration. For each of these areas, a senior staff member presented an introductory lecture. This staff member then led a demonstration role play which was followed by a group review of the demonstration. After the review, all of the interviewers participated in role play activities.

After these topical areas had been addressed, a detailed discussion of each instrument was held. Individual items were discussed using the Question-by-Question Specifications Manual as a guide. Role play was then enacted using the specific interview instruments.

DATA COLLECTION

Representative Site Visits

The interviewers visited a total of 100 school districts receiving Title I funds. The sequencing of site visits was based primarily upon consideration of possible cost efficiencies. All the sites within a reasonable driving radius (up to 175 miles) of the airport nearest the initial site were scheduled so as to form a loop for car travel. By sequencing sites in this manner, the interviewers returned to the same metropolitan area from which they began the loop, thereby reducing unnecessary travel and expenditures.

The twelve temporary interviewers and nine rotating permanent project staff members formed eight site visit teams. Each

team was assigned to one of eight regions for the first three weeks of site visits. For the second three weeks, each interviewer was teamed with a different person and conducted site visits in a different region.

District visits varied in length; the average visit took two days to complete. The length of each visit was based upon:

- Number of schools in district
- School population
- Program complexity
- District preference

The number of interviews conducted in each district also varied. Reported below are the number of district-level interviews completed by respondent category during the representative site visits:

<u>Respondent</u>	<u>Number of Interviews</u>
Title I Director	100
Coordinator of Instructional Component	70
Special Education Director	91
Bilingual/ESL Director	48
DAC Chairperson or Member	98

In each district, a number of schools were visited (in districts with more than one Title I school) on a stratified random basis. If a district served secondary or nonpublic school students, at least one of each of these schools was visited. The

number of schools visited ranged from one to seven depending upon:

- Total number of schools in the district
- School population
- Secondary and nonpublic participation in the Title I program

The total number of each type of school visited was as follows:

<u>School Type</u>	<u>Number of Interviews</u>
Elementary (K-6)	182
Secondary (7-12)	54
Nonpublic	40

At the schools visited, the following personnel were interviewed:

<u>Respondent</u>	<u>Number of Interviews</u>
School Principal	276
Title I Instructor	276
Regular Classroom Teacher	276

At one of the schools visited in each district, we also interviewed a member of the School Advisory Council [SAC]. We conducted a total of 74 such interviews. In 26 of these schools, either the school did not operate a Title I SAC or the member who was randomly selected was not available during the site visits.

Special Purpose Case Study Site Visits

Case studies were conducted in 40 special purpose sites between November and December 1981. Twenty of the visits examined nonpublic participation in Title I programs. The remaining

20 visits focused on the local administration of Title I programs.

Each nonpublic site was visited for two days. The first day was spent conducting interviews with personnel in the districts' central office, the participating nonpublic schools, and the nonpublic school supervising office. The following day was spent reviewing correspondence between nonpublic and public schools and logs of district communication with nonpublic schools, if they existed. In general, the first day was used for gathering facts as related by specific individuals within the district. The second day was spent verifying and supplementing that information through document review, further discussion, and whatever means seemed most appropriate within the particular district.

The local administration case studies were more complex and required five days at each site to adequately complete them. The first two days of these visits were structured and involved interviews with such central office staff as the Title I Director, the Coordinator of Instructional Component, and the Director of Special Programs. The last three days were spent following up any leads these discussions may have revealed which were relevant to questions in the case study protocol.

This follow-up activity entailed further discussions with relevant personnel and the collection and review of documents including correspondence, project descriptions at the individual schools, agendas of meetings where instructional approaches and student selection were discussed, rosters of students considered

for selection in Title I programs, and districts' Title I application(s).

DATA PROCESSING

Processing of Mail Questionnaires

To ensure that every mail questionnaire site received a questionnaire and no more than the appropriate number of follow-up letters, a thorough monitoring procedure was followed.

The mail questionnaires were returned directly to Advanced Technology by District Title I Directors. The receipt of each instrument was recorded in a master log, and the instruments were grouped into batches for coding. Questionnaires were checked at this point in the process to ensure that all pages were present and that there had not been any tampering with the identification numbers. Questionnaires that contained a majority of items in an incorrect format were referred to the senior project staff.

Where possible, the senior project staff attempted to correct the problem with a phone call to the districts in question. Instruments that were in order were then passed on to the coding staff.

A series of three follow-up letters were sent, as appropriate, to nonresponding districts in an effort to secure the greatest number of mail questionnaire returns. Each district not responding to these follow-up letters was contacted by phone and offered an identical mail questionnaire if the first sent had not been received or if it had been misplaced.

Processing of Interview Instruments

When packets of interviews were received, they were examined for completeness. Senior staff, for example, reviewed each

packet; and attention was paid to ensure that sufficient detail had been recorded for proper coding of the responses. If the interview packet was incomplete or unclear, phone calls were made to the appropriate interviewer or school official. Interview materials were then forwarded to the coding staff.

Data Coding

Several procedures were employed to maintain a high level of quality control over the coding of the study's raw data. First, coding of the open-ended items on the mail questionnaires and the interview instruments was performed by specially trained staff members. Categories for all items were developed in advance and covered a broad range of possible responses. Before the actual data were received, all coders coded a series of test protocols to ensure that intercoder reliability was at least 90 percent. Training was repeated until such reliability was achieved.

Coding frameworks were expanded as necessitated by questionnaire responses. When pre-established frameworks were found inadequate, new response codes were developed, approved by the Manager for Data Analysis, and uniformly adopted by all coders.

While coding was in progress, the senior staff reviewed coded instruments to verify their accuracy and thoroughness. Any deficiencies discovered were brought to the attention of the individual coder. Once all instruments had been coded, they were again reviewed before being sent to keypunching.

Keypunching and Data Cleaning

All responses were converted to numeric codes and then keypunched onto magnetic tape. All punched data was verified by the keypunchers.

Both automated and manual verification were performed. The first step of data verification was preliminary validation.

EASYTRIEVE software modules verified the following items on the raw data files for each form type:

- Identification code validity--validation done against a table of district codes valid for either the interview sample instrument or the mail questionnaire
- Form number validity
- Form sequence number validity
- Card number validity--verification of the proper sequence and correct number of records within each set

The EASYTRIEVE modules generated error listings. Erroneous data were checked against the original forms and corrections were made. At this point, the interview sample instruments and the mail questionnaires were handled in a somewhat different manner.

The interview instruments contained a large number of variables (over 1,100 combined), but the number of cases of any one form to be processed was relatively small. Therefore, for the sake of efficiency, further validation of these instruments employed both automated and manual means.

All interview data underwent a preliminary frequency check on all variables using the Statistical Package for the Social Sciences [SPSS]. This rapidly identified data which fell out of

legitimate ranges. The instruments for the Title I Director, Coordinator of Instructional Component, Special Education Director, Bilingual/ ESL Director, and Principal were then manually validated to verify proper skip patterns, ranges, and other requirements.

The DAC instrument, SAC instrument, Title I Instructor, and Regular Classroom Teacher forms were further validated using a generalized COBOL data validator developed for this project. This software performed the same type of verification done manually on the other interview forms. Variables which fell out of range in the SPSS verification were checked using this validator. Output from this validation was automatically separated into files of valid and invalid data. Invalid data elements were checked against the original forms and corrections were made where appropriate.

Since 1,793 mail questionnaires were processed, the data verification for these forms was entirely automated. After the preliminary validation described earlier, the COBOL validator was used to verify range and skip patterns. The few edits that could not be performed by this means were performed through specially written EASYTRIEVE, COBOL, SPSS, and PL/I modules.

Data that failed the editing procedures were handled in several ways. For items that permitted development of appropriate correction rules (e.g., skip patterns), programs were developed that automatically modified the rejected data. For other items, the original questionnaires and interviews were accessed

to determine if the rejected data were due to keypunch errors; if so, they were replaced with corrected values.

Invalid data not due to keypunch errors (including missing responses for items) were handled in two ways. Values for items identified as critical were pursued with follow-up phone calls. If this was unsuccessful, missing data values were inserted for those variables. Values for rejected data that could not be corrected by follow-up were maintained with documentation indicating the reason for rejection. Noncritical invalid data were classified as missing without an attempted correction by follow-up.

Files of clean data were built by continually merging sub-files of data which were either clean from the start or which had been corrected and revalidated. At the end of the verification process, there was one file of totally valid data for each form type.

File Organization

The data files that were created are accessible by either the SPSS or the Statistical Analysis System [SAS]. SPSS was the primary software package, but certain types of analyses were available only through SAS. All variables and all values for a variable were labeled. File documentation was integrated into the data base so that when analysis files are transported to other computer installations, relevant information about the data base will be readily available.

Data for the interview sample were stored so that all data for a particular district comprised one set of computer records.

This data organization allowed comparison of responses from different individuals within the same district.

NATIONAL PROJECTIONS

The sampling design that was implemented for the mail survey equalizes the variance estimate for each of the size categories, while producing overall national estimates accurate to ± 2 percent of the mean percent estimated. In order to obtain a national picture of the Title I program, the data file was weighted. This was accomplished with the use of a variable in the data file called WT. Requesting SPSS to weight an analysis using the variable WT causes the following weights to be applied to each case within the appropriate size categories:

<u>Enrollment Size Category</u>	<u>Enrollment Size</u>	<u>Weighting Factor</u>
Small	0-2,499	1.644
Medium	2,500-9,999	.631
Large	10,000+	.237
Certainty	60 Largest Districts	.256

Analyses using the weighting factor produce an apparent sample size equal to the actual number of survey questionnaires returned by Title I Directors, but reflecting a nationally representative profile of the Title I program.

While the stratification that was employed for the mail survey sample selection reduces the variance of national estimates considerably, this design effect is counterbalanced by the necessary weighting procedures just described, producing a resultant

confidence interval that is slightly larger than would be obtained from a simple random sample of districts. We estimate that approximate sampling errors for the proportions reported in the following chapters are as shown in Table A-2.

TABLE A-2

SAMPLING ERROR IN PERCENT BY SIZE OF SAMPLE AND REPORTED PERCENT BEING ESTIMATED*

Reported Percent	Size of Sample or Group			
	<u>1700</u>	<u>400</u>	<u>250</u>	<u>100</u>
50	3	6	7	12
30 or 70	3	6	7	11
20 or 80	2	5	6	10
10 or 90	2	4	5	7

*The chances are 95 in 100 that the value being estimated lies within a range equal to the reported percent plus or minus the number of percent points shown above.

BIBLIOGRAPHY

BIBLIOGRAPHY

- AUI Policy Research. Utilization and Effects of Alternative Measures of Comparability. Washington, DC: AUI Policy Research, August 1981.
- Berke, Joel S., and Michael W. Kirst. Federal Aid to Education: Who Benefits? Who Governs? Lexington, KY: Lexington Books, A.C. Heath and Co., 1972.
- Berke, Joel S., and Elizabeth J. Demarest. "Alternatives for Future Federal Programs." In Mary F. Williams (ed.), Government in the Classroom: Dollars and Power in Education. New York: The Academy of Political Science, 1978.
- Browning, R. Stephen, and Jack Costello, Jr. "Title I: More of the Same." Inequality in Education. Cambridge, MA: Harvard Center for Law and Education, June 1974.
- Cooper, Bruce. An Analysis of Private School Growth: The Latest Word and the Newest Survey Techniques. Paper presented at the American Education Research Association Meeting, New York, March 22, 1982.
- CPI Associates. An Exploratory Study of the Impact of Parent Advisory Councils on the Management and Administration of Title I Programs at the Local Level. Dallas, TX: Author, 1979.
- Demarest, Elizabeth. The DHEW Sanction Study. Washington, DC: Department of Health, Education, and Welfare, (Office of Assistant Secretary for Education/Policy Development), 1977.
- Education Policy Research Institute. Changing the Federal/State Partnership in Education: An Analysis of S. 1780, The Reorganization and Consolidation Demonstration Project. Washington, DC: Author, 1979.
- Gurwitz, Aaron and Linda Darling-Hammond. Maintenance of Effort Provisions: An Instrument of Federalism in Education. R-2684-ED. Santa Monica, CA: Rand, Inc., June 1981.
- Hinkley, Ronald (Ed.). Student Home Environment, Educational Achievement, and Compensatory Education. Report #4, Sustaining Effects Study. Santa Monica, CA: System Development Corporation, 1979.
- Keesling, J. Ward. Parents and Federal Education Programs: Preliminary Findings from the Study of Parental Involvement. Santa Monica, CA: System Development Corporation, 1980.

Lamda Corporation. Fall 1973 Title I Comparability Survey.
Vols. 1-3. Washington, DC: Office of Program Evaluation,
August 1974.

National Association of State Boards of Education, Robert
Silverstein. The Education Consolidation and Improvement
Act of 1981: Its Meaning for State and Local Policymakers
and Administration. Washington, DC: 1981.

National Center for Education Statistics. School Districts
Participating in Multiple Federal Programs, FRSS Report No.
7, Winter 1978-79.

National Center For Education Statistics. A Comparison of
Selected Characteristics of Private and Public Schools.
Washington, DC: June 1981. (Mimeographed)

National Center for Education Statistics. Private Schools in
American Education. Washington, DC: Author, 1981.

National Institute of Education. Volume I: Compensatory
Education Services, (1977) in The National Institute of
Education Compensatory Education Study: Collected Reports.
Washington, DC: Department of Health, Education, and
Welfare, 1978.

National Institute of Education. Volume III: Administration of
Compensatory Education in The National Institute of Edu-
cation Compensatory Education Study: Collected Reports.
Washington, DC: Department of Health, Education, and
Welfare, 1978.

National School Boards Association. The Education Consolidation
and Improvement Act of 1981: A Manual for Local Policy
Makers and Administration. 1981.

Orland, Martin E., Robert Goettel, Bernard Kaplan, et al.
A Study of the Administration of ESEA, Title I, at the
Federal, State, and Local Level: A Final Report. Syracuse,
NY: Syracuse Research Corporation, 1977.

Reisner, Elizabeth. The Office of Education Administers Changes
in a Law: Agency Response to Title I, ESEA Amendments of
1978. Washington, DC: Department of Education (National
Advisory Council on the Education of Disadvantaged Chil-
dren), 1980.

School Management Services. Short-Term/Long-Term Recommendations
for the Collection of Data on the Participation of Private
School Students in Selected Federal Education Programs.
Unpublished second and final draft paper submitted to the
National Center for Education Statistics, February 1981.

- Silverstein, Robert. A Policymakers Guide to Title I of the Elementary and Secondary Education Act and Its Relationship to State and Local Special Programs. Denver, CO: Education Commission of the States, 1979.
- Silverstein, Robert. "Federal Approaches for Ensuring Equal Opportunity: Past, Present, and Future." Unpublished paper, November 1981.
- Silverstein, Robert. A Textual Comparison Between the New Regulations Governing Title I of ESEA and the Title I Statute, the Existing Title I Regulations, and the Legislative History. Washington, DC: Education Funding Research Council, January 1981.
- Silverstein, Robert, Michael Gaffney, David Long, Ellen Mattleman, Carol Morgan, and Daniel M. Schember. A Description of the Title I ESEA Legal Framework. Washington, DC: Lawyers' Committee for Civil Rights under Law, 1977.
- Silverstein, Robert, and Daniel M. Schember. An Analysis of the Basis for and Clarity and Restrictiveness of the Program Requirements Applicable for Grants under Title I of the Elementary and Secondary Education Act. Washington, DC: Lawyers' Committee for Civil Rights under Law, 1977.
- Special Report Number 1, Title I Services to Students Eligible for ESL/Bilingual or Special Education Programs. Description of District Practices Since 1978 under Title I of the Elementary and Secondary Education Act. August 31, 1982. (300-80-0933)
- Special Report Number 2, Current Title I School and Student Selection Procedures and Implications for Implementing Chapter 1, ECIA. Description of District Practices Since 1978 under Title I of the Elementary and Secondary Education Act. August 31, 1982. (300-80-0933)
- Special Report Number 3, Technical Assistance under Chapter 1, ECIA: Lessons from Title I Practices. Description of District Practices Since 1978 under Title I of the Elementary and Secondary Education Act. August 31, 1982. (300-80-0933)
- Special Report Number 4, The Influence of Title I Budget Cuts on Local Allocation Decisions: Some Patterns from Past and Current Practices. Description of District Practices Since 1978 under Title I of the Elementary and Secondary Education Act. August 31, 1982. (300-80-0933)

Special Report Number 5, Paperwork and Administrative Burden for School Districts under Title I. Description of District Practices Since 1978 under Title I of the Elementary and Secondary Education Act. August 31, 1982. (300-80-0933)

Special Report Number 6, The Effects of the Title I Supplement-Not-Supplant and Excess Costs Provisions on Program Design Decisions. Description of District Practices Since 1978 under Title I of the Elementary and Secondary Education Act. August 31, 1982. (300-80-0933)

Special Report Number 7, Nonpublic School Students in Title I, ESEA Programs: A Question of "Equal" Services. Description of District Practices Since 1978 under Title I of the Elementary and Secondary Education Act. August 31, 1982. (300-80-0933)

Special Report Number 8, State Influence on Local Title I Practices. Description of District Practices since 1978 under Title I of the Elementary and Secondary Education Act. August 31, 1982. (300-80-0933)

U.S. Department of Education. 1977 Performance Reports. Washington, DC: 1979. (Mimeographed)

U.S. Department of Education. 1980 Performance Reports. Washington, DC: 1982. (Mimeographed)

U.S. Department of Education. An Evaluation of ESEA Title I-- Program Operations and Educational Effects. Washington, DC: Department of Education (Office of Planning, Budget, and Evaluation), 1982.

U.S. Department of Education. Nonregulatory Guidance to Assist State Educational Agencies Administering Federal Financial Assistance to Local Educational Agencies for Projects Designed to Meet the Special Educational Needs of Educationally Deprived Children under Chapter 1 of the Education Consolidation and Improvement Act of 1981 (Draft). April 22, 1982.

U.S. General Accounting Office. Proposed Changes in Federal Matching and Maintenance of Effort Requirements for State and Local Governments. Washington, DC: GAO, December 1980.

U.S. General Accounting Office. Report to the Congress by the Comptroller General of the U.S.: Assessment of Reading Activities under the Federal Program of Aid for Educationally Deprived Children. Washington, DC: GAO, December 1975.

- U.S. House of Representatives. H.R. Rep. 1137, 95th Congress, 2d Session, 1978.
- U.S. House of Representatives, Subcommittee on Elementary, Secondary, and Vocational Education. Hearings on H.R. 15, 95th Congress, 1st Session, Part 18: Administration of Title I of ESEA, 1977.
- U.S. Senate. S. Rep. 856, 95th Congress, 2d Session, 1978.
- Vitullo-Martin, Thomas. Interim Report--Summary Report: Delivery of Title I Services to Non-Public School Students. Unpublished report submitted to Paul Hill, Director of the Compensatory Education Study, October 10, 1977.
- Vitullo-Martin, Thomas. On the Comparability of Services Provided to Private School Students under Title I of the Elementary and Secondary Education Act (as amended, 1974) and on the Impact of the Act on Private Schools. A Report for the Education Equity Group, Compensatory Education Division of the National Institute of Education. Washington, DC: Council for American Private Education, September, 1979.
- Wang, Ming-Mei, et al. The Nature and Recipients of Compensatory Education: Report #5, Sustaining Effects Study. Santa Monica, CA: System Development Corporation, 1978.
- Winslow, Hal, and Ann Herschberger. Supplement Not Supplant: A Note on the Definition and Use of a Title I Requirement. Palo Alto, CA: Stanford Research Institute International, 1977.
- Wirt, Timothy. Incrementalism in Educational Policy Making: A Case Study of Title I, ESEA. An unpublished dissertation. Stanford, CA: Stanford University, 1973.