

# OREGON TITLE I-A HANDBOOK

No Child Left Behind Act of 2001  
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**Oregon Department of Education**

Office of Educational Improvement and Innovation

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Salem, OR 97310

<http://www.ode.state.or.us>

*Susan Castillo*

*State Superintendent of Public Instruction*

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This document is available on our Title I-A web page at:

<http://www.ode.state.or.us/search/results/?id=95>

Updates and amendments will be sent to Title I coordinators and updated on our web page as they are developed. This document will remain the basic Title I Handbook for Oregon until the next reauthorization of the Elementary and Secondary Education Act.

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# Oregon Title I Handbook

## CH. 1 CONTACTS

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# Oregon Title I Handbook

## CH. 2 ABOUT THIS HANDBOOK

The Oregon Title I Handbook will be located on the Title IA Home page of the Oregon Department of Education Website.

<http://www.ode.state.or.us/search/results/?id=95>

ALL forms in this handbook are provided as samples only.

Periodic changes in federal program requirements mean that forms will usually need to be updated annually. Updated forms will be posted on the website and updates sent to coordinators as they are developed. The forms included in the handbook are intended to give coordinators a general overview of the information that will be required and should NOT be submitted to the Office of Educational Improvement and Innovation (*except where noted*).

**Visit the ODE website:** <http://www.ode.state.or.us/> to see the variety of services and support throughout the Department of Education.

**Reminder:** The U.S Department of Education is available at <http://www.ed.gov> and has the No Child Left Behind Act online: legislation, regulations, policy guidance and more.

<b>Section</b>	<b>Location</b>
ODE Home Page	<a href="http://www.ode.state.or.us">http://www.ode.state.or.us</a>
NCLB Grants and Programs	<a href="http://www.ode.state.or.us/search/results/?id=75">http://www.ode.state.or.us/search/results/?id=75</a>
Title IA: Basic Program	<a href="http://www.ode.state.or.us/search/results/?id=95">http://www.ode.state.or.us/search/results/?id=95</a>
Title IC Migrant Education	<a href="http://www.ode.state.or.us/search/results/?id=99">http://www.ode.state.or.us/search/results/?id=99</a>
Title ID	<a href="http://www.ode.state.or.us/search/results/?id=100">http://www.ode.state.or.us/search/results/?id=100</a>
Title IF	<a href="http://www.ode.state.or.us/search/results/?id=101">http://www.ode.state.or.us/search/results/?id=101</a>
Title IIA	<a href="http://www.ode.state.or.us/search/results/?id=102">http://www.ode.state.or.us/search/results/?id=102</a>
Title IID	<a href="http://www.ode.state.or.us/search/results/?id=105">http://www.ode.state.or.us/search/results/?id=105</a>
Title III	<a href="http://www.ode.state.or.us/search/results/?id=106">http://www.ode.state.or.us/search/results/?id=106</a>
Title IV	<a href="http://www.ode.state.or.us/search/results/?id=107">http://www.ode.state.or.us/search/results/?id=107</a>
Title V Parental Choice and Innovative programs	<a href="http://www.ode.state.or.us/search/results/?id=109">http://www.ode.state.or.us/search/results/?id=109</a>
Title X Homeless Education	<a href="http://www.ode.state.or.us/search/results/?id=113">http://www.ode.state.or.us/search/results/?id=113</a>
AYP Reports	<a href="http://www.ode.state.or.us/data/reportcard/reports.aspx">http://www.ode.state.or.us/data/reportcard/reports.aspx</a>
Teaching and Learning Resource Center	<a href="http://www.ode.state.or.us/teachlearn/standards/center">http://www.ode.state.or.us/teachlearn/standards/center</a>
Charter Schools	<a href="http://www.ode.state.or.us/search/results/?id=124">http://www.ode.state.or.us/search/results/?id=124</a>

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# Oregon Title I Handbook

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## **CH. 3 INTRODUCTION TO TITLE I**

The purpose of the federally funded Title I program is to help disadvantaged students meet the same high academic standards expected of all children. The most recent reauthorization of the Elementary and Secondary Education Act (ESEA) is the No Child Left Behind Act of 2001. This education bill was enacted on January 8, 2002 and has established several national mandates as well as a much stronger level of accountability for the progress of all students, especially disadvantaged students.

Title I was a key part of president Lyndon B. Johnson's program to strengthen the educational program for students of poverty. Using a poverty-based formula, Title I, allocates funds to more than 90% of the nation's school districts to offset the effects of poverty on the educational opportunities of low-performing children in high-poverty schools. Title I is the largest single program of federal aid for elementary and secondary education and given its size and pervasiveness, Title I has long been the selected entity for the federal government to implant the twin missions of the U.S. Department of education: enforcing equity and promoting excellence in education.

Title I includes Part A: Improving Basic Programs; Part B-1: Reading First; Part B-2: Early Reading First; Part B-3: Even Start Family Literacy; Part C: Education of Migratory Children; Part D: Neglected or Delinquent Children and Youth; Part F: Comprehensive School Reform (CSR). The Oregon Department of Education, Office of Educational Improvement and Innovation carries out administration of Title IA, IB, IC, ID, IF (Comprehensive School Reform), Title IIA, IID, Title III: Language Instruction for Limited English Proficient and Immigrant Students, Title V: Parent Choice and Innovative Programs, Title VI: Flexibility and Accountability and Title X McKinney-Vento Act for Education of Homeless Children and Youth. The Office of Student Learning and Partnerships carries out administration of Title IV (Safe and Drug Free Schools).

The federal Title I requirements match Oregon's development of challenging content and performance standards. Title I programs use the same assessments that are in place in Oregon for all children. Districts and schools now have greater flexibility to create programs responsive to the local needs of students in exchange for greater accountability for student performance. Recognizing that the quality of Title I programs depends on the skill of staff, NCLB emphasizes highly qualified staff and continuous, sustained professional development. Decision making is centered at the school level with parent involvement as a key component.

Title I distributes funds to schools based on the number of children from low-income families rather than on achievement scores. Unchanged from the original intent, Title I monies are provided to supplement state and local efforts. These federal funds may not be used in a manner which supplants regular education responsibilities and programs. The NCLB law allows more schools to take advantage of the schoolwide model by dropping the eligibility rate to 40% Free and Reduced Lunch count. The schoolwide model allows Title I funds to be used along with other federal, state, and local funds to upgrade and reform the entire instructional program in the school for all students. Title I funds are to be used to create opportunities which extend learning time, minimize pull-out programs that remove children from the classroom, implement



accelerated curriculum strategies rather than remedial drill and practice, and use effective strategies based on scientifically based research.

## **Title I: Improving the Academic Achievement of Disadvantaged Students**

### **SUMMARY SHEET**

#### **Part A: Improving Basic Programs Operated by Local Educational Agencies**

- Supports LEAs in providing high-quality opportunities for students in high poverty schools to meet the same challenging State content and performance standards
- Promotes extending learning time in accelerated rather than remedial classes through new provisions.
- Increases parents' knowledge of their children's educational program and opportunities, increase parents' decision-making regarding their children's education (Parental Choice and Supplemental Services and effective parental participation in program design.
- Expands eligibility for schools to operate Schoolwide programs that serve all children in high poverty schools.
- Supports achievement of effective transitions from preschool to school and from school to work.
- Establishes accountability based on results, drawing data from the Oregon Statewide Assessment.
- Assures fair and equitable participation of private school students.
- Supports coordination with health and social services.

#### **Part B-3: Even Start Family Literacy Programs**

- Strengthens the targeting of services to families most in need.
- Extends eligibility for this intergenerational literacy program to teen parents who are among the most needy.

#### **Part C: Education of Migratory Children**

- Helps provide migratory children the same opportunities as other children to meet challenging state performance standards.
- Creates a more focused program to target efforts on the most mobile children, those whose schooling is most likely to be disrupted.

#### **Part D: Education of Neglected and Delinquent Youth**

- Extends educational services and learning time in state institutions and community day programs for neglected or delinquent children and youth making services more comparable to those of LEAs.
- Encourages smooth transitions to enable participants to continue schooling or to enter the job market upon leaving the institution.

#### **Part F: Comprehensive School Reform Projects**

- Provides opportunities through competitive grants to help support state and local school reform efforts.
- Promotes the adoption of research-based instructional and/or school improvement designs.

Additional information regarding the purposes of all NCLB Title programs may be found in the No Child Left Behind: A Desktop Reference Washington D.C.,2002, Prepared by the Office of the Under Secretary <http://www.ed.gov/admins/lead/account/nclbreference/index.html>

## Terminology

### Definitions

<b>Adequate Yearly Progress</b>	The measure by which Title I schools and district programs are determined to be exemplary, on target, or in need of improvement.
<b>Attendance Area</b>	In relation to a particular public school, the geographical area in which the children who are normally assigned to that school reside.
<b>Basic Grant</b>	Title I funds available for any given district with 10 or more formula funded children and a formula count of children greater than 2% of the total district enrollment.
<b>Carryover</b>	Title I funds allocated to a district, unencumbered by the end of the Federal fiscal year, September 30.
<b>Carryover Limit</b>	For districts with Title I grant award of \$50,000 or greater, up to 15% may be carried over into the next fiscal year. A waiver to exceed the 15% limit may be applied for once every three years.
<b>Concentration Grant</b>	Additional Title I funds available in qualifying districts within counties where the county-wide poverty is greater than 15%.
<b>Educationally Disadvantaged</b>	Children whose educational attainment is less than the benchmark standard of proficient considered appropriate for children of their age.
<b>Eligible Children</b>	Children among the eligible population failing or most at risk of failing to meet Oregon's challenging academic achievement standards. Children who are economically disadvantaged, children with disabilities, migrant children or limited English proficient children, are eligible for Title IA services on the same basis as other children. Children who are homeless attending <u>any</u> school are eligible. A child who, at any time in the 2 previous years participated in a Head Start, Even Start, Early Reading First or Title IA funded preschool or migrant services is eligible. Children in local institution for neglected or delinquent children and youth or attending community day program for Neglected or Delinquent children are eligible for Title IA services.
<b>Eligible Population</b>	The eligible population for Title IA funded services is children not older than age 21 who are entitled to a free public education through grade 12. Preschool children are also part of the eligible population.
<b>Equalization</b>	The district has the option to reserve this amount of dollars necessary to offset salary differences among staff members, i.e., the option to staff at will regardless of salary level.
<b>Fiscal Year</b>	The twelve-month period normally used by the SEA for record keeping (July 1-June 30) or the federal fiscal year (Oct 1-September 30).
<b>Formula Funded Children</b>	For any given school district, the number of children for whom Title I funds are distributed from the State Agency. This number is the sum of: the number of children living in families at or

	below the poverty level as reported on the last US Census, the number of children residing in foster homes, and the number of children residing in institutions for neglected or delinquent children and youth.
<b>Grade Span</b>	Grade span refers to groupings of students. Typically, elementary schools serve K-5 grade span; middle schools serve 6-8; high schools serve 9-12. If a district has schools that overlap grade spans (e.g., K-5, K-8, 6-8) the district may include a school in the grade span in which it is most appropriate.
<b>Hold Harmless</b>	A provision within the law that prevents a dramatic loss of funds to occur, due to shifts in poverty count, in any one year.
<b>Improving America's School Act</b>	The 1994 reauthorization of the Elementary and Secondary Education Act of 1965. NCLB is now the name of the current reauthorization of the ESEA.
<b>Institution For Delinquent Children And Youth</b>	A public or private residential facility that is operated primarily for the care of children and youth who have been adjudicated to be delinquent or in need of supervision and have an average time in residence is 30 days or more.
<b>Institution For Neglected Children And Youth</b>	A public or private residential facility, other than a foster home, that is operated primarily for the care of children and youth who have been committed to the institution or voluntarily placed in the institution due to abandonment, neglect or death of their parents or guardians and who have an average time in residence is at least 30 days or more (to be included in the "count" for funding purposes, one of which must be in the month of October).
<b>Local Education Agency (LEA)</b>	A phrase that is a synonym for school or education district.
<b>Maintenance Of Effort</b>	District audited expenditures, excluding federal funds, which demonstrate that either the combined fiscal effort per student or the aggregate expenditures per district are not less than 90% of the previously audited year.
<b>Preschool Children</b>	Children below the age and grade level at which the district provides free public education and who can benefit from an organized instructional program provided in a school or other educational setting.
<b>Public</b>	Under the administrative supervision or control of a government other than the federal government.
<b>Non-Public School</b>	A private educational facility not under the administrative supervision or control of state or local government.
<b>Reallocation</b>	Excess funds remaining at the end of the project year redistributed to districts with demonstrated needs.
<b>Reserves</b>	Title I funds set-aside at the state or district level for specific, identified purposes, also referred to as "set-asides."
<b>Set-Asides</b>	Title I funds reserved at the state or district level for specific, identified purposes, also referred to as "reserves."
<b>Schoolwide Program (SWP)</b>	A high poverty school (40% or greater), receiving Title IA funds, that has undergone a full year of planning for comprehensive restructuring to upgrade the educational program for all

	students, that has received technical assistance during the planning year, had the plan reviewed by an outside school support team, filed the reviewed plan at the district office, and has begun implementation of its plan.
<b>State Education Agency (SEA)</b>	A phrase that refers to state level department of regulation responsible for education. In Oregon the SEA is the Oregon Department of Education (ODE).
<b>Targeted Assistance School (TAS)</b>	Any school receiving Title I funds that has not implemented a Schoolwide Program Plan. The school is providing a supplemental program for a targeted group of students.
<b>Title I</b>	Title I of No Child Left Behind Act of 2001: Improving Basic Programs. The purpose is to help disadvantaged children meet the academic state standards. Title I has many parts and subparts.
<b>Title I Students</b>	Children served by programs funded through Title I A. Often the term is used to identify students eligible and participating in Title I Part A programs.

## Historically Underserved/Underrepresented Students

### Background

Program planning in all school districts in Oregon must focus on regularly and systematically improving the strategies that will promote opportunities for all students to achieve to high standards and expectations. Historically, some groups of students have not had access to equal opportunities to work toward achievement of the same high standards and expectations afforded to other groups. The term used to describe their conditions under federal laws is *Historically Underserved or Underrepresented Students*.

### Purpose

The purpose of identifying historically underserved or underrepresented students is to ensure educational equity for all students. Each district routinely submits signed documents assuring compliance with equal educational opportunities under the various federal and state laws, however specific strategies for translating those assurances into actions are often unaddressed within the district's overall plan.

While the Department of Education provides working definitions of the terms "historically underserved" and "underrepresented", each district must decide on delivery of services for student groups identified within the definitions. Definitions should be used not only to determine eligibility for a program or programs, but also to promote the opportunity to achieve for historically underserved or underrepresented students. When applicable, definitions are those currently used by districts for identifying students on the annual Fall Enrollment Report.

### Definition

Students are underserved or underrepresented if they do not enjoy a full day of learning time with culturally, linguistically, and developmentally relevant curriculum strategies delivered by qualified staff in adequate structures. The result of being underserved is that these students do not perform at appropriate levels on Statewide Assessments and do not participate in supplementary extra-curricular activities provided by schools or communities.

Definitions directly related to identification of historically underserved and underrepresented students include the following, which are taken from current interpretations of federal, and state laws and regulations related to specific services for which students may be eligible. Users of these definitions are advised that a student may belong to, and be identified under, more than one group, e.g. racial, gender, linguistic and/or disability. Resources may thus be drawn from more than one source to fully address the needs of the student.

### Race/Ethnicity

A student may be included in the group to which he or she identifies with, appears to belong or is regarded in the community as belonging to.

- **White** (*not of Hispanic origin*) - a student having origins in any of the original peoples of Europe, North Africa, or the Middle East.
- **Black** (*not of Hispanic origin*) - a student having origins in any of the black racial groups of Africa.
- **Hispanic Origin** - a student of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, **regardless of race**.

- **Asian/Pacific Islander** - a student having origins in any of the original peoples of the Far East, Southeast Asia, the Pacific Islands, or the Indian subcontinent.
- **American Indian/Alaska Native** - a student having origins in any of the original peoples of North America. Regulations from the U.S. Department of Education also provide the following definition: The term "Indian" means an individual who is:
  - (A) a member of an Indian tribe or band, as membership is defined by the tribe or band, including -
    - (i) any tribe or band terminated since 1940; and
    - (ii) any tribe or band recognized by the State in which the tribe or band resides;
  - (B) a descendant, in the first or second degree, of an individual described in subparagraph (A);
  - (C) considered by the Secretary of the Interior to be an Indian for any purpose;
  - (D) an Eskimo, Aleut, or other Alaska Native; or
  - (E) a member of an organized Indian group that received a grant under the Indian Education Act of 1988 as it was in effect the day preceding the date of enactment of the Act entitled the Improving America's Schools Act of 1994. (Subpart 6, Sec. 9161, P.L. 103-382)"

### **Gender**

This category is included to ensure Sex equity.

### **Talented and Gifted Children**

Talented and Gifted children means those children who require special educational programs or services, beyond those normally provided by the regular school program in order to realize their contribution to self and society and who demonstrate outstanding ability or potential one or more of the following areas:

- a) General intellectual ability as commonly measured by measures of intelligence and aptitude.
- b) Unusual academic ability in one or more academic areas.
- c) Creative ability in using original or nontraditional methods in thinking and producing.
- d) Leadership ability in motivating the performance of others either in educational or non-educational settings.
- e) Ability in the visual or performing arts, such as dance, music or art.

### **Disability**

The term "individual with a disability" means any person who has a physical or mental impairment which substantially limits one or more of such person's major life activities, has a record of such impairment, or is regarded as having such an impairment. This definition includes, but is not limited to, students who are eligible under the Individuals with Disabilities Education Act (IDEA). Under the IDEA, children with disabilities means children who require special education because of mental, physical, emotional or learning problems including the following categories: mental retardation; hearing impairments including hard of hearing and deafness; deaf/blind; communication disorders; visual impairments; serious emotional disturbances; orthopedic or other health impairments; autism; traumatic brain injury; and specific learning disabilities.

**National Origin (Minority Language)**

The term "National Origin" appears in Equal Education Opportunity languages to indicate students whose home, native, or indigenous language is other than English.

**Poverty/Low Income**

The annual indicators for poverty are published by the federal government in the spring and are based on a federal formula adjusted for several factors. Indicators for low income are based on poverty level plus an additional percentage, depending on the federal or state guideline for eligibility for one or more specific services, e.g. below 100% of poverty, at 100% of poverty, 125% of poverty, or 150% of poverty.



## **Acronyms**

<b>AFDC</b> .....	Aid to Families with Dependent Children
<b>AYP</b> .....	Adequate Yearly Progress
<b>CAI</b> .....	Computer-Assisted Instruction
<b>CAM</b> .....	Certificate of Advanced Mastery
<b>CIM</b> .....	Certificate of Initial Mastery
<b>CIP</b>	Continuous Improvement Plan ( LEA Plan)
<b>CFR</b> .....	Code of Federal Regulations
<b>CRT</b> .....	Criterion-Referenced Test
<b>CSR</b> .....	Comprehensive School Reform Program (Title I-F)
<b>DE</b> .....	Distinguished Educator
<b>EAB</b> .....	Education Appeal Board
<b>ECIA</b> .....	Education Consolidation and Improvement Act of 1981
<b>ED</b> .....	United States Department of Education
<b>EDGAR</b> .....	Education Department General Administration Regulations
<b>ELL</b> .....	English Language Learners
<b>ELP</b>	English Language Proficient
<b>ESEA</b> .....	Elementary and Secondary Education Act of 1965
<b>ESL</b> .....	English as a Second Language
<b>FTE</b> .....	Full-Time Equivalent (8.0)
<b>FY</b> .....	Fiscal Year
<b>GEPA</b> .....	General Education Provisions Act
<b>NCLB</b> .....	Improving America's Schools Act of 1994
<b>IDEA</b> .....	Individuals with Disabilities Education Act
<b>IEP</b> .....	Individualized Education Plan
<b>LEA</b> .....	Local Education Agency
<b>LEP</b> .....	Limited English Proficient/Proficiency
<b>MESC</b> .....	Migrant Education Service Center
<b>N or D</b> .....	Neglected or Delinquent
<b>NAPPP</b> .....	National Average Per Pupil Payment
<b>NASTID</b> .....	National Association of State Title I Directors
<b>NCLB</b>	No Child Left Behind Act of 2001
<b>NRT</b> .....	Norm-Reference Test
<b>OACE</b> .....	Oregon Association for Comprehensive Education
<b>OALJ</b> .....	Office of Administrative Law Judges
<b>OCR</b> .....	Office of Civil Rights
<b>ODE</b> .....	Oregon Department of Education
<b>OMB</b> .....	Office of Management and Budget
<b>SEA</b> .....	State Education Agency
<b>SES</b> .....	Socio-Economic Status
<b>SIP</b> .....	School Improvement Plan
<b>SPPE</b> .....	State Per Pupil Expenditure
<b>SWP</b> .....	Schoolwide Program
<b>TAS</b> .....	Targeted Assistance School
<b>USDE</b> .....	United States Department of Education

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# Oregon Title I Handbook

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## **CH. 4 TITLE IA COORDINATOR SUPPORT**

### **Tips for New Title IA Coordinators**

1. Read the most current Continuous Improvement Plan (CIP) <http://www.ode.state.or.us/search/results/?id=201> and; study the CIP Budget Narrative/Spending Workbook, review the staffing pages and read the District Assurances.
2. Read the last reports submitted to the Oregon Department of Education. Required reports include:
  - ✓ Final budget (Read any amended budget requests that were submitted.)
  - ✓ End-of-Year Report
  - ✓ Report of Adequate Yearly Progress for each school receiving Title IA funds .  
<http://www.ode.state.or.us/data/reportcard/reports.aspx>
  - ✓ End-of-Project Fiscal Report
  - ✓ October count of students served in Institutions for Neglected and/or Delinquent Youth
3. Read the district's Adequate Yearly Progress report for each year beginning with 2000-2001 to date. Review in the Oregon Title IA Handbook, Chapter 13 to learn how Title I schools can move into and out of School Improvement status.
4. Familiarize yourself with the Oregon Title IA Handbook.
5. Visit often in your Title I schools. Familiarize yourself with their procedures for student selection, service delivery, parent involvement, and the highly qualified staff requirements.
6. Visit any private schools that may be participating in the Title IA program and any institutions or homes receiving Title IA funds for neglected or delinquent youth. Familiarize yourself with the services being provided by the district for those students.
7. Read your district's policies governing:
  - ✓ Family Involvement
  - ✓ Complaint Procedures
  - ✓ Admission of Students
  - ✓ Supervision of Paraprofessionals
  - ✓ Professional Development of Staff
  - ✓ Publicizing and Disseminating Annual Review Information
8. Read the most recent Continuous Improvement Plan. Get involved in CIP development activities.
9. Requirements to learn about and know as soon as possible:
  - ✓ The differences between targeted assistance schools and schoolwide programs. (What are the configurations for the Title I funded buildings in your district?)
  - ✓ Targeting procedures for selecting and funding eligible schools for Title IA. (Is your district required to target eligible schools for Title IA?)

- ✓ Annual program evaluation requirements. (Has the district or any of its Title IA schools been identified for program improvement?)
- ✓ Program improvement requirements, if applicable.
- ✓ The difference between “supplement” and “supplant.”
- ✓ Student selection requirements for targeted assistance schools.
- ✓ Requirements for serving homeless/highly mobile  
<http://www.ode.state.or.us/search/results/?id=113> and
- ✓ Requirements for kindergarten students transitioning from Oregon Pre-kindergarten/Head Start and/or Even Start programs.

10. Things to learn as you go along:

- ✓ How to assist schools with their annual needs assessment.
- ✓ Best practices related to serving students with diverse needs.
- ✓ The relationships between the assessment of student academic achievement and school, program and district evaluation.
- ✓ Comparability requirements. (Is your district required to complete a formal comparability study? If so, when was the last study done and are the documents on file?)

11. Hints for organization and record keeping:

- ✓ Set up your files using the Title I Review documents as an organizational guide. Refer to Chapter 14 of this handbook. Keep current documents that will serve as evidence for each of the questions.
- ✓ If any of your schools are authorized as schoolwide programs, keep copies of their current plans on file at the district office.
- ✓ Keep lists of students served in targeted assistance schools, including criteria by which students were selected, date of entry into program, date of exit, reason for exit (e.g., academic exit, moved, dropped by parent request, etc.).
- ✓ Keep a copy of the district Title IA equipment inventory. (When it's convenient, conduct a physical inventory against the inventory records on file. Check the location of all Title I equipment; make sure all Title IA purchased equipment is marked as Title I. (see specific information regarding schoolwide programs).

12. Activities and Other Helpful Hints

- ✓ Watch for state Title I “Coordinator Update” e-mails. Read them carefully.
- ✓ Check the Oregon Department of Education Title IA website often.
- ✓ Whenever possible, attend Title I Coordinator meetings, Oregon Association for Comprehensive Education Summer Institute and/or winter conference to learn the most current information regarding NCLB and Title I.
- ✓ Keep the Oregon Department of Education, Office of Educational Improvement and Innovation Office phone number close at hand. Feel free to call whenever you have a question.

## **General Timeline**

- ◆ **July/August: Official Grant Award Notification from USDE to SEA.** Generally, this notice is made in the first or second week of July. This amount is used for the final confirmation of each district allocation for the upcoming year.
- ◆ **July 15: Deadline for End-of-Year On-line Report**
- ◆ **August: Subgrant Award Notification (SANS) (Form 581-3140a-X revised 6/04) to LEAs.** Districts receive funding authorization for the upcoming year.
- ◆ **October- Final Revised Budget** to ODE. Districts submit revised Spending Workbook using final Title allocations.
- ◆ **October - Continuous Improvement Plan due October 2005.**  
The CIP will be due to ODE every two years, though it may be continuously updated as needed by the district.
- ◆ **Final Project Expenditure Report:**  
Final report is due 45 days after project funds expended.
- ◆ **Monthly Subgrant Claims Statement**  
Federal funds are processed under a letter of credit grant award system.  
<http://www.ode.state.or.us/services/accounting/claims/3140b-O.doc>  
This form is sent electronically each month to the district business manager. The business manager must use “generic e-mail” to be able to receive this statement. If there are questions contact Melinda Weinmann, 503-378-3600 in the Office of Finance and Administration. .
- ◆ **January:** Districts that have filed waivers to exceed the 15% carryover limitation from the previous school year will be reviewed and monies that remain *in excess of 15%* will be liable for return to ODE for redistribution to higher need districts. See Title IA Reallocation under Chapter 5 Fiscal Requirements in this handbook.
- ◆ **May: CIP Budget Narrative/Spending Workbook, Assurances and Certifications is due at ODE.** This document will be on the ODE website in March. Coordinators for the individual Federal programs included in the application are encouraged to work collaboratively to determine opportunities to coordinate program efforts to increase effectiveness and efficiency and reduce redundancies.
- ◆ **June: Review and approval of applications:** The review is conducted by ODE staff and field representatives. Districts can assist greatly by ensuring that deadlines are met and that the application is accurate and complete. Districts submitting applications that are late or incomplete will generally experience some delay in receiving funds.

## **Title I Coordinator Calendar**

A month by month list of key activities to be completed as a Title IA Coordinator is provided at the following link [Title IA Coordinator Calendar](#)

## **District Assurances**

Each district is responsible for meeting the legal requirements of the No Child Left Behind Act as a condition of applying for and accepting all Title funds. Districts are required, as a part of their annual CIP Budget Narrative (previously know as the Consolidated Sub-grant Application), to sign the Assurances that indicates awareness and commitment to meeting specific NCLB requirements.

### **What Are Assurances And Who Signs Them?**

The *Assurance Certification* is a statement that assures that all legal requirements are met in accordance with federal and state laws and regulations that define specific program activities and expenditures of funds. The superintendent or designee signs the *Assurance Certification*. Signed *Assurances* form a binding agreement between the applicant (the LEA), the Oregon Department of Education (ODE) and the U.S. Department of Education (USDE) that all legal requirements are met in accordance with state and federal laws, regulations, and rules. The signature authorizes the LEA to accept funds and conduct programs that support consolidated improvement plan goals and serve eligible students.

### **Where Will The Assurances Be Maintained?**

LEAs are required to maintain documentation at district and school sites to verify their activities.

### **Who Is Responsible For Program Compliance?**

Compliance with general and specific federal program laws is the legal responsibility of the LEA under the authorization of the local board of education and the direction of the superintendent. The principal assures oversight at the school level. District program coordinators assist the superintendent and principal by monitoring compliance with specific programs at the district and school level and providing technical assistance on specific legal requirements of federal and state funded programs to local planning teams. District and school planning teams develop specific program activities. Central office personnel, specifically program coordinators, are critical in assuring that local planning teams, site councils, and principals understand the *Assurance Certification* and adhere to specific program requirements.

## **NCLB DISTRICT ASSURANCES**

### **Title IX General Assurances That Apply to Title IA as well as all other Title Programs**

The school district, in regard to all Titles in this act for which the applicant requests funding, assures that

- Each program will be administered in accordance with all applicable statutes, regulation, program plans, and applications.
- The control of funds provided under each such program and title to property acquired with program funds will be in a public agency or in a nonprofit private agency, institution, organization, or Indian tribe, if the law authorizing the program provides for assistance to those entities, and the public agency, nonprofit private agency, institution, or organization or Indian tribe will administer the funds and property to the extent required by the authorizing statutes.
- The district will adopt and use proper methods of administering each such program, including
  - The enforcement of any obligations imposed by law on agencies, institutions, organizations, and other recipients responsible for carrying out each program; and
  - The correction of deficiencies in program operations that are identified through audits, monitoring, or evaluation.
- The district will cooperate in carrying out any evaluation of such program conducted by or for the State educational agency, the Secretary, or other Federal officials.
- The district will use such fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds paid to the applicant under each such program.
- The district will
  - Submit such reports to the Oregon Department of Education (ODE) and the Secretary as the ODE and Secretary may require to enable the ODE and the Secretary to perform their duties under each such program;
  - Maintain such records, provide such information, and afford such access to the records as the ODE after consultation with the Governor or the Secretary may reasonable require to carry out ODE's or the Secretary's duties.
- Before the application was submitted, the district afforded a reasonable opportunity for public comment on the application and considered such comment.

### **Uniform Provisions in NCLB**

The following uniform provisions apply to all districts receiving any funds under No Child Left Behind.

The district agrees to

- Comply with the provisions of section 9501 concerning the participation of private school children and teachers. *Title IX 9501; Title IA 1120*
- Allow the Boy Scouts of America will have equal access to school and district facilities. *Title IX 9525*
- Prohibitions concerning sex education and dissemination of information and condoms in public schools. *Title IX section 9526*

- Comply with the requirements for providing armed forces recruiters with access to students and student recruiting information. *Title IX 9528*
- Comply with maintenance of effort requirements. *Section 9521*

### **Title I-A Improving Basic Programs**

In accepting Title IA funding the school district assures that it has a plan that meets the requirements of Section 1112. This is Local Educational Agency Plan as outlined in NCLB. In Oregon this is the Continuous Improvement Plan and Budget Narrative.

The district further assures that it will

- Participate, if selected, in State National Assessment of Educational Progress in 4<sup>th</sup> and 8<sup>th</sup> grade reading and mathematics carried out under section 4111(b)(2) of the National Education Statistics Act of 1994.
- Inform eligible schools and parents of Schoolwide Program authority and the ability of such schools to consolidate funds from Federal, State, and local sources.
- Provide technical assistance and support to Schoolwide Programs.
- Work in consultation with schools as the schools develop schools' plans pursuant to section 1114 and assist schools as the schools implement such plans or undertake activities pursuant to section 1115 so that each school can make adequate yearly progress toward meeting Oregon student academic achievement standards.
- Fulfill such agency's school improvement responsibilities under section 1116, including taking actions under paragraphs (7) and (8) or section 1116 (b).
- Provide services to eligible children attending private elementary schools and secondary schools in accordance with section 1120, and timely meaningful consultation with private school officials regarding such services.
- Take into account the experience of model programs for the educationally disadvantaged, and the findings of relevant scientifically based research indicating that services may be most effective if focused on students in the earliest grades at schools that receive funds under this part.
- In the case of a district that chooses to use funds to provide early childhood development services to low income children below the age of compulsory school attendance, ensure that such services comply with the performance standards established under section 641A of the Head Start Act.
- Work in consultation with schools as the schools develop and implement their plans or activities under section 1118 and 1119.
- Comply with the requirements of section 1119 regarding the qualifications of teachers, paraprofessionals and professional development
- Inform eligible schools of the district's authority to obtain waivers on the school's behalf.
- Coordinate and collaborate, to the extent feasible and necessary as determined by the district, with the ODE and other agencies providing services to children, youth and families with respect to a school in school improvement, corrective action or restructuring, if the school requests assistance from the district in addressing major factors that have significantly affected student achievement at the school.
- Ensure, through incentives for voluntary transfers, the provision of professional development, recruitment programs, or other effective strategies that low income and minority students are not taught at higher rates than other students by unqualified, out of field or inexperienced teachers.
- Use the results of Oregon State Assessment (OSA), and other measures or indicators to review annually the progress of each school served by the district and receiving Title IA

funding to determine whether all of the schools are making the progress necessary to ensure that all students will meet Oregon proficient level of achievement on OSA by 2014.

- Ensure that the results from OSA will be provided to parents and teachers as soon as is practicably possible after the assessment is given in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand.
- Assist each school served by the district and receiving Title IA funds in developing or identifying examples of high quality, effective curricula consistent with section 1111.



## **Title I-A Improving Basic Programs Funding Parental Involvement Assurances**

The district assures that it will develop jointly with, agreed upon with, and distribute to, parents of participating children a written Parental Involvement policy, with attention to the participation of the parents of LEP, disabled, economically disadvantaged and major racial and ethnic students. The policy shall be incorporated into the district plan developed under section 1112. The policy shall describe how the district will meet the requirements set forth in section 1118.

In addition the district assures that

- Each school served under this part shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy agreed on by such parents, that shall describe the means for carrying out the requirements of subsections (c) through (f) of section 1118 of NCLB.
- Each school served under Title IA as a component of the school parental involvement policy shall jointly develop with parents for all children served under this part (in a Targeted Assistance School, this means all students served by the program, in a Schoolwide Program this means all students enrolled at the school)a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve Oregon's high standards. The required elements of the compact are outlined in sec. 1118, NCLB.
- Each school principal operating a Targeted Assistance or Schoolwide Program has attested in writing as to whether the school is in compliance with the *Qualifications for Teachers and Paraprofessionals, section 1119, NCLB* requirements. And that these statements are kept on file at the school and district office and are available to the public.
- Parents of students in Title I schools are notified of the availability of information on teacher and paraprofessional qualifications and are notified if their child is taught for four or more consecutive weeks by a teacher who is not highly qualified *Section 1116*.
- The district has on file a written assurance of compliance with comparability of services requirement (section 1120A, NCLB) by demonstrating that has established and implemented
  - A district wide salary schedule;
  - A policy to ensure equivalence among schools in teachers, administrators, and other staff; and
  - A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

## **Title I-C Education of Migratory Children**

All districts participating in Title IC programs assure that funds received under this part will be used only

- For programs and projects, including the acquisition of equipment, in accordance with section 1306 NCLB.
- To coordinate such programs and projects with similar programs and projects within Oregon and other States, as well as with other Federal programs that can benefit migratory children and their families.
- Such programs and projects will be carried out in a manner consistent with the objectives of: section 1114, subsection (b); (d) of Section 1115, subsections (b); and (c) of section 1120A and part I.

In planning and the operation of programs and projects, the district will

- At both the State and district operating level, have consultation with parent advisory councils for programs of one school year duration, and that all such programs and projects are carried out in a manner that provides for the same parental involvement as is required for program and projects under section 1118, unless extraordinary circumstances make such provision impractical; and in a format and language understandable to the parents.
- Provide for adequate provisions for addressing the unmet education needs of preschool migratory children.
- Determine the effectiveness of such programs and projects, where feasible, using the same approaches and standards that will be used to assess the performance of students, schools, and districts under part A.
- To the extent feasible, provide for advocacy and outreach activities for migratory children and their families, including informing such children and families of, or helping such children and families gain access to, other education, health, nutrition, and social services; professional development programs, including mentoring, for teachers and other program personnel; family literacy programs, including such programs that use models developed under Even Start; the integration of information technology in educational and related programs; and programs to facilitate the transition of secondary school students to postsecondary education or employment.

In addition, the district will

- Provide high quality and comprehensive educational programs for migratory children to help reduce educational interruptions and other problems resulting from repeated moves.
- Ensure that migratory children receive full and appropriate opportunities to meet the same challenging State academic content and student achievement standards that all children are expected to meet.
- Will identify, recruit and certify eligible students.
- Will participate in the Oregon Migrant Student Information System (OMSIS) and keep adequate records for OMSIS, such as types of instruction and support services.
- Encourage meaningful and effective parent involvement in planning, operation, and evaluation of their children's educational program.
- Provide ongoing service and professional development to migrant program staff.
- Provide support services as needed to enable migrant children to participate in the educational programs.
- Provide interagency coordination with existing agencies in the region/LEA that provide services to migrant families.

## **Title II-A Preparing, Training, and Recruiting High Quality Teachers and Principals**

The district assures that it will target funds to schools within its jurisdiction that

- (A) have the lowest proportion of highly qualified teachers;
- (B) have the largest average class size; or
- (C) are identified for school improvement under section 1116(b).

## **Title II-D Enhancing Education Through Technology**

- The district assures and certifies compliance with the Children’s Internet Protection Act (CIPA) regulations, policies and requirements.
- As required under the Elementary and Secondary Education Act, the district will use these funds to implement its qualifying technology plan.

## **Title III Language Instruction for Limited English Proficient and Immigrant Students**

Districts receiving Title III funds, either directly or through a Title III Consortium, must agree to spend Title III funds on two required activities: 1) increase English proficiency and student academic achievement of ELLs; and 2) provide high-quality professional development to classroom teachers, principal, administrators involved in the education of ELLs (Sec. 3115). All Title III activities must be directly linked to the goals of this program: 1) Assist ELLs in attaining English proficiency 2) Assist ELLs in meeting the state’s academic standards; 3) Develop high quality English language instruction programs for ELLs; 4) Develop and enhance high quality instruction programs designed to prepare ELLs to enter all-English instruction settings; 5) Build capacity to establish, implement, and sustain language instruction programs and programs of English language development for ELLs; 6) Promote parental and community participation in language instruction for the parents and communities of ELLs. (Sec. 3102)

- In accordance with the provisions of Title III, the signature below assures the Oregon Department of Education that the district or consortium lead agency will submit a sub-grant application that addresses Title III requirements.
- The district, or the consortium lead agency on behalf of its Title III consortium members, further assures the Oregon Department of Education that the district is in compliance with the following Title III provisions:
  - Compliance with parental notification, prior to and throughout each school year (Sec. 3302);
  - Annual assessment of English proficiency of ELLs in grades K-12 (Sec. 3116);
  - All activities proposed in the sub-grant application are based on scientific research demonstrating program effectiveness on teaching ELLs (Sec. 3115);
  - Activities are designed to significantly increase the English proficiency of ELLs in listening, speaking, reading and writing and assist ELLs in meeting state content standards. (Sec.3115);
  - The district has consulted with teachers, researchers, school administrators, and parents, and, if appropriate, with education-related community groups and nonprofit organizations, and institutions of higher education, in developing this sub-grant application (Sec 3116);
  - The district is in full compliance of any State law regarding the education of ELLs such as [ORS 336.079](#) Special English courses for certain children; [ORS 336.081](#)

Opportunity to qualify to assist non-English speaking students; [ORS 327.013\(7\)\(a\)\(B\)](#) State School Fund distribution computations (added ADM for students enrolled in an English as a Second Language Program) as well as [OAR 581-022-1140](#) (Equal Educational Opportunities), [OAR 581-21-0046\(8\)](#) (Program Compliance Standard-[8]), Bilingual or Linguistically Different Students) and [OAR 581-23-100](#) (3)(C)(b)(4) (Eligibility Criteria for Student Weighting for Purposes of State School Fund Distribution - .5 times the ADM for students in ESL classes). [OAR 581-23-100](#) (3)(C)(b)(4) charge districts to develop programs for English language learners that meet basic U.S. Department of Education, Office for Civil Rights guidelines.

### **Title IV Part A Safe and Drug Free Schools and Communities**

The district assures that

- The activities or program comply with principles of effectiveness and foster a safe and drug free learning environment.
- The drug and violence prevention programs convey a clear and consistent message that acts of violence and illegal use of drugs are wrong and harmful.
- The schools and LEAs have a plan for keeping schools safe and drug free including:
  - Discipline policies that prohibit
    - Disorderly conduct;
    - Illegal possession of weapons;
    - Illegal use, possession, distribution and sale of tobacco, alcohol and other drugs by students;
  - Security procedures at and on the way to and from school;
  - Prevention activities that are designed to create and maintain safe, disciplined and drug-free environments;
  - Crisis management plan for responding to violent or traumatic incidents on school grounds;
  - Code of conduct for all students that clearly states responsibilities of students, teachers and administrators, in maintaining a class room environment that
    - Allows teachers to communicate effectively with all students;
    - Allows all students to learn;
    - Has consequences that are fair and developmentally appropriate;
    - Considers the student and circumstances;
    - Is enforced accordingly.
- The application and any waiver will be available for public review after submission.

## **Title V Promoting Informed Parental Choice and Innovative Programs**

The district assures that it will

- Comply with the provisions of section 5142 concerning the participation of children enrolled in private nonprofit schools.
- Comply with requirements of Title V for participation.
- Keep such records, and provide such information to the ODE, as may be reasonably required for fiscal audit and program evaluation (consistent with the responsibilities of ODE under this part).
- Have programs carried out under this part will be evaluated annually.
- Have the evaluation be used to make decisions about appropriate changes in programs for the subsequent year.
- Have the evaluation describe how assistance under this part affected student academic achievement and will include, at a minimum, information and data on the use of funds, the types of services furnished, and the students served under this part.
- Have the evaluation be submitted to the ODE at the time in the manner requested by ODE.

## **Title X McKinney-Vento Act**

The LEA assures the Oregon Department of Education that it will implement appropriate educational policies and practices in keeping with the intent and purposes of NCLB - Title X (2002 McKinney-Vento Homeless Assistance Act [PL 101-645, Subtitle VII-B]), maintaining adequate documentation to fulfill statutory and regulatory requirements for audit and monitoring purposes.

- The LEA assures that it will implement policies and procedures to ensure that activities will not isolate or stigmatize homeless children and youth.
- The LEA assures that funds awarded will be used to supplement, and not supplant, other federal, state and local funds that are available to provide services to homeless children and youth.

## **District Documentation**

### **Title I-A Documentation to Keep On File**

All current year Title I-A documents must be accessible at the district and/or Title I-A building(s). Districts are required to keep Title I-A documents for five years. After five years, documentation related to Title I-A may be disposed of at the district's discretion. The district Title I coordinator should have an Oregon Title I-A Handbook for desk reference. In addition, it is recommended that each Title I funded building have a copy of the handbook accessible either as a hardcopy or electronically. Hard copies of the Title I handbook can be paid for by Title I-A funds.

### **District Office/District Title I Coordinator**

#### **All Districts:**

- ❑ Copy of the current Continuous Improvement Plan and Budget Narrative
- ❑ Signed *Subgrant Award Notification (SANS)*
- ❑ Current/final, state approved program budget (CIP Budget Narrative)
- ❑ The written program Review Report from the district's last on-site review
- ❑ List of Students Served by Title I A funded Target Assistance programs.
- ❑ Time sheets and schedules for split-funded staff, staff schedules for fully-funded Title I staff
- ❑ Copies of Title I program budgets from each building or district set-aside project (e.g., district Title I summer school, district Title I services for children who are homeless)
- ❑ Copies of Title I funded teacher licenses with appropriate endorsements noted
- ❑ Copies of letters and evidence of meetings with officials of private schools located within district boundaries
- ❑ Copy of district (Title I) parent involvement policy (A separate policy governing Title I parent involvement is not necessary when the district parent involvement policy is overarching and includes all educational programs in the district.)
- ❑ Copies of each Title I funded school parent involvement policy
- ❑ Copies of parent compacts from each school
- ❑ When applicable, a copy of each existing schoolwide program plan with reviewers' comments and a copy of the current Schoolwide plan.
- ❑ District policy for handling (Title I related) complaints. A separate policy governing Title I is not necessary when the district complaint procedure policy is overarching and includes all educational programs in the district.
- ❑ A copy of the school board minutes documenting the appointment of an authorized representative to apply for federal funds. May be in July Board Minutes.
- ❑ A copy of the annual evaluation for each school receiving Title IA funds.
- ❑ When applicable, documentation of district-level support for any Title I funded school identified as in School Improvement. School Improvement plan on file.

#### **Districts over 1,000 student enrollment with more than one building at any grade level:**

- Policy documents governing comparability of personnel, materials and supplies among buildings and comparability study of current or most previous school year
- Documents establishing eligibility of Title I schools

**It is a good practice for the district coordinator to have copies of school-level Title I documents on file at the district office.**

**Targeted Assistance Building/Title I Teacher File:**

- A description of the criteria used for student selection
- Students served by Title I
- A description or list of the pool of students eligible for Title IA services
- A current list of the eligible students served by the Title I program. Each list should include:
  - student's full name,
  - student identification number (when available),
  - date of birth,
  - date of entry into the Title I program,
  - when applicable date and type of exit (academic exit, moved, etc.).
- The previous year's needs assessment and summary of annual Title I program review
- Staff schedules
- Title I program budget
- Copy(s) of School-Parent Compact
- Title I equipment inventory
- When applicable, program improvement plan

**Schoolwide Program Buildings:**

- The schoolwide program planning document with reviewer comments and on-going revisions, when appropriate
- School budget
- Most recent needs assessment and summary of annual review including student achievement information

## **End-of-Year Student Participation Report**

The Title IA End-of-Year Report is now a web-based survey. The End of the Year report includes but is not limited to: the number of students by grade levels, gender and subgroups who received Title I funded services, types of instructional and non-instructional services provided by Title IA funds, number of private school students. This report is a data gathering document and is due at the end of each school year, usually no later than July 1.

The End-of-Year Report should not be confused with the “Detailed Final Project Report” which is a financial report sent to each district along with their Subgrant Award Notification (SANS) showing their Title I-A and Title VI allocation. The Detailed Final Project financial report is due within 45 days after a project’s federal funds are entirely expended.

- The following End-of-Year report form may be used to gather information for each building. This is a sample of the data usually requested by the U.S. Department of Education for the states’ annual final report. Some districts gather this information through their electronic system. The data will be collected by ODE through an electronic survey.
- Be sure that each Title I funded school is collecting and keeping the necessary documentation so that this information is readily available when the End-of-Year report is due. The district may have an electronic means in which to collect the data needed.
- In a schoolwide program all students are considered Title I students when recording number of students in the various categories.



**BUILDING LEVEL - TITLE I-A END-OF-YEAR REPORT**

SCHOOL YEAR \_\_\_\_\_

<b>CONTACT INFORMATION</b>
School Name and Contact
Address (include number, street, city, state, and zip code):
Name (include title) and Telephone of contact for report:

**PART 1: TITLE I-A SCHOOL AND LEA PARTICIPATION**

**District Schools -**

<p><b>Total Number of Schools in District:</b></p> <p>Number of <u>authorized operating</u> <b>Schoolwide Programs:</b>                  . DO NOT REPORT SCHOOLS IN PLANNING YEAR.</p> <p>Number of <b>Funded Targeted Assistance Schools (TAS):</b>  <b>TOTAL SCHOOLS SERVED WITH TITLE I-A FUNDS:</b></p> <p>Give the number of:  <b>Schools in Planning Year for Schoolwide Programs</b>                  during this school year  <u>schools 40% or greater NOT Schoolwide or planning</u>                  for schoolwide. (May be either TAS or unfunded.)  <b>Targeted Assistance Schools eligible, but not funded</b>                  with Title IA.</p>	
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<b>B.</b>	Number of Title I extended time instructional programs in operation (i.e., before school, after-school, weekend, and/or summer)	
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**Note:** In reporting extended time instructional programs, include before and after school and summer school programs, but exclude adult education, pre-school programs, or club activities.

**PART 2: STUDENT PARTICIPATION in Title I-A by Special Services or Programs**

Number of TITLE IA SERVED STUDENTS by Special Services or Programs

	Number of Students Served
Students with Disabilities	
Limited English Proficient	
Homeless	
Migrant	

Number of Students Participating in Title I-A by Racial or Ethnic Group

By racial/ethnic group:	Number of Students Served
American Indian or Alaskan native	
Asian	
Black or African American	
Hispanic or Latino	
Native Hawaiian or Pacific Islander	
White	
<b>TOTAL TITLE I SERVED STUDENTS: *</b>	

**Participation of Homeless Students in Title IA**

<b>Number of homeless children &amp; youth served:</b>	
Birth to K:	
K - Elementary:	
Middle School:	
High School:	
To age 21 (if diploma or GED not received):	
<b>Total</b>	

**Participation by Grade Level - Public / Non-public :**

\_Student participation should be reported as unduplicated counts. Enter the number of participants by grade in Title I public targeted assistance programs, Title I schoolwide programs, private school students participating in Title I programs, and students served in Part A local neglected programs.

By Age/Grade	Public TAS	** Public SWP	Private School Students	Local Neglected	TOTAL
Age 0-2					
Age 3-5					
Kindergarten					
Grade 1					
Grade 2					
Grade 3					
Grade 4					
Grade 5					
Grade 6					
Grade 7					
Grade 8					
Grade 9					
Grade 10					
Grade 11					
Grade 12					
Un-graded					
<b>TOTAL PARTICIPATION:</b>					

.\*\* This count should include all students enrolled in the school.

**Student Participation in Title I-A Targeted Assistance Programs**

(Include Public and Private Schools students)

<b>Student Participation in Targeted Assistance Programs by Instructional and Support Services</b>	<b>Number of Students Served</b>	<b>Private School Students</b>
<b>Instructional Services</b>		
Reading/Language Arts		
Mathematics		
Science		
Social Studies		
Vocational/Career		
Other (specify)		
<b>Support Services</b>		
Health/Dental and Eye Care		
Supporting Guidance/Advocacy		
Other (specify)		

**Job Classification (Targeted Assistance Schools Only):**

Provide the number of full-time equivalent (FTE) staff funded through Title I-A Targeted Assistance Programs by job category. For administrators and supervisors who serve both targeted assistance and schoolwide programs, report the FTE attributable to their TAS duties only.

**Number of staff employed with Title I funds in TAS programs.  
Report in full-time equivalents (FTE) by job classification.**

<b>JOB CLASSIFICATION</b>	<b><u>Number of Title I Targeted Assistance Program FTE Staff</u></b>
Administrators ( <i>non-clerical</i> )	
Teachers	
Instructional Assistants	
Staff providing support services ( <i>non-clerical</i> )	
Other ( <i>specify</i> ) _____	
Homeless Liaison ( <i>to locate and enroll homeless children &amp; youth</i> )	

## **Academic Achievement Awards and Distinguished Schools**

### **Title I Academic Achievement Awards**

The No Child Left Behind Act, Title I Part A, Section 1117 requires each state to establish a program for making academic achievement awards to recognize schools that meet the following criteria. The criteria is for those schools that significantly closed the achievement gap for the AYP determined subgroups; or exceeded their adequate yearly progress for 3 or more consecutive years.

### **Title I Distinguished Schools Program**

The No Child Left Behind Act, Title I Part A, Section 1117, requires that each state identify and designate as “distinguished schools” schools that have made the greatest gains in closing the achievement gap or exceeded adequate yearly progress. Such distinguished school may serve as models for and provide support to other schools, especially schools identified for school improvement to assist such school in meeting Oregon’s academic achievement standards.

Title I Part A funds may be used to allow distinguished schools to carry out these activities. Districts are encouraged to recognize the success of a distinguished school by providing additional institutional and individual rewards. District and state Title I funds may be used to award distinguished schools.

Oregon’s Title I Distinguished School nominees must meet the criteria for nomination as a National Title I Distinguished School. In addition to meeting national criteria, these schools must demonstrate overall student achievement that is above the state average or the state standard as measured by Oregon State Assessment in both reading and mathematics and have a satisfactory or higher overall rating on the *Oregon School Report Card*. Criteria and process are being redesigned to meet the new criteria using our AYP data. Watch for this program to be reinstated for the 2005-06 school year. The Title I Distinguished School Nomination form will be located on the ODE website, Title IA Homepage <http://www.ode.state.or.us/search/results/?id=95>

## **Complaint Form and Procedure**

Each district receiving Title I funds must demonstrate that it has disseminated, free of charge, adequate information about complaint procedures to parents of Title I served students and to appropriate private school officials or representatives regarding any complaint they might have that the local district or state agency or agencies is violating a Federal statute or regulation that applies to Title IA.

The complaint must be in writing and signed by the complainant. It must include:

- a statement that the agency or agencies, or a consortium of agencies have violated a requirement of a Federal statute or regulation that applies to Title IA ;
- the facts on which the statement is based; and
- the specific requirement allegedly violated.

While Federal Rules and Regulations do not specify procedures or timelines, the U.S. Department of Education believes that a reasonable period of time for hearing and resolving a complaint would generally be 60 to 90 days. School districts are expected to make complaint procedure information available in languages other than English to the extent appropriate.

The district may design its own complaint procedure form or use the generic complaint procedure form located on the following page.

District designed Title IA Complaint form must include:

1. Your Name, Address, Telephone
2. Name of Your School, District, and County
3. Parent or Private School Representative
4. Who Do You Believe is Responsible:: School District, Consortium of Districts, Education Service District, Oregon Department of Education. (Check all that apply.)
5. Nature of Complaint
6. Documentation (include facts and dates)
7. Specific Title IA requirements you believe have been violated.
8. Name of School District Representative (to be filled in by designated school representative)
9. Date of Complaint (to be filled in by designated school representative)

## TITLE IA, NCLB COMPLAINT FORM

PLEASE TYPE OR PRINT CLEARLY

Attach additional pages as necessary.

<b>DATE SUBMITTED:</b>	
<b>1.</b> Name of complainant, address, phone: _____ _____ _____	<b>2.</b> County: _____  <b>3.</b> School District _____  <b>4.</b> Name of School <i>(if applicable)</i> : _____
<b>5.</b> Name of representative for parent or school <i>(if applicable)</i> : _____	
<b>6.</b> Complaint seeks resolution from: <i>(check all that apply)</i> : <input type="radio"/> School District <input type="radio"/> Consortium of Districts <input type="radio"/> Education Service District <input type="radio"/> Oregon Dept. of Education	<b>7.</b> Federal Rules and Regulations or NCLB Law on which the complaint is based: _____ _____
<b>8.</b> Nature of Complaint:	<b>9.</b> Documentation in support of complaint: <i>(factual list, including dates of incident(s))</i> :          
<b>10.</b> What specific Title IA requirement(s) do you believe was not met?	<b>11.</b> Name of School District Representative <i>(to be completed by designated representative)</i> : _____  <b>12.</b> Signature of Complainant: _____

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# Oregon Title I Handbook

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## **CH. 5 FISCAL REQUIREMENTS**

Comparability among buildings, maintenance of effort and supplement not supplant are the three overarching federal fiscal requirements, none of which may be waived. If a district is found to have even one Title I building that is non-comparable, the district as a whole is out of compliance and may be in danger of losing ALL Title IA funds.

### **Supplement not Supplant**

The No Child Left Behind Act makes no significant changes to the fiscal requirement but the U.S. Department of Education has somewhat modified its interpretation of some major provisions.

#### **The Rule**

The supplement not supplant provision requires that federal funds be used to augment the regular education program, and not to substitute for funds or services that would otherwise be provided in the same time period. The statute requires that the district as well as the state use federal funds received under Title I only to supplement the amount of funds available from nonfederal sources for the education of students participating in Title I A. The state and districts cannot use these federal funds to supplant funds that would, in the absence of Title I funds been spent on the Title I students.

#### **Examples of Supplanting**

- The district uses Title I funds to provide services that the district was required to make available under other federal, state or local law or
- The district uses Title I funds to provide services that the district provided with nonfederal funds in the prior year.

The *Compliance Supplement*: OMB Circular A-133 ( <http://www.whitehouse.gov/omb/> ) is a guide for auditors on the key provisions of each program states that the presumptions of supplanting can be rebutted if the district can demonstrate that it would not have provided the services in question with nonfederal funds had the federal funds not been available. The actual question is: what would have happened in the absence of the federal funds? If the district would not have provided the service without the Title funds, then it can overcome the presumption of supplanting.

#### **Targeted Assistance Programs**

In a targeted program the supplanting prohibition is usually interpreted to mean that additional program services must be provided to identified Title I students. In the past many districts designed targeted programs to “pull out” students and provide additional services. The Improving America’s Schools Act in 1994 discouraged the pull-out model in favor of more extended time or “push in” methods. Even in the more integrated model of a targeted assistance program, the school must be able to show that the additional services are directed toward the identified targeted students.



## Schoolwide Programs

The supplanting analysis in a schoolwide program is quite different from the targeted assistance analysis. Since the schoolwide program funds can be consolidated and used to support any expenditures of the schoolwide plan, supplanting in a schoolwide program is purely a **fiscal analysis**, not a program analysis.

A schoolwide program must use Title I funds only to supplement **the amount of funds** that would, in the absence of Title I, have been made available from nonfederal sources for the school. This includes funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency. The schoolwide program is not required to demonstrate that any particular service is supplemental to the services regularly provided in the school to all students.

## **Maintenance of Effort**

### **The Rule**

Maintenance of Effort requires districts to demonstrate that the level of state and local funding remains relatively constant from year to year. The statute states that a district may have their Title I funds reduced to the degree the district has not maintained its fiscal efforts as required by the Elementary and Secondary Education Act (ESEA). The state must determine that either the combined fiscal effort per student or the aggregate expenditure of the district from state and local funds for free public education for the preceding fiscal year was not less than 90% of the combined fiscal effort.

In determining whether a district has maintained fiscal effort, the state must analyze the district's expenditures from both state and local funds for free public education. The Compliance supplement states that the district's expenditures include expenditures for:

- Administration
- Instruction
- Attendance and health services
- Pupil transportation
- Operations and maintenance
- Fixed charges and
- Net expenditures to convert deficits for food services and student body activities

## **Comparability**

### **The Rule**

Comparability requires that the district be able to document that the services provided with state and local funds in Title I-A Schools are comparable to those provided in non-Title I-A schools in the district.

In order to receive Title I-A funds, a district with more than one building at any grade span must assure each year that its buildings are comparable with regard to state and local spending (Title I Part A Section 1120A).

Exceptions:

- 1) Districts with only one building per grade span are exempt from comparability requirements.
- 2) Schools within a district that have no comparable group (e.g., one small elementary school among others significantly larger or a single school at a particular grade span) may be exempted from a district's comparability study.

### **To meet comparability requirements a district must have:**

- A district-wide salary schedule
- A policy to ensure equivalence among schools, including staff, curriculum materials and instructional supplies.
- In Oregon, in order to demonstrate comparability, districts are required to complete a formal comparability study at least every two years. This study, along with the salary schedule and policy documents is to be on file at the district office with the other Title I administrative records, available to be examined upon request. Although the study is required only every other year, buildings within a district must be comparable on an on-going basis. Therefore, it is considered best practice to complete a comparability study annually.

A district may also meet the comparability requirement using other measures, such as student/instructional staff ratio or student/instructional staff salary ratios.

**A comparability study compares the average district spending, excluding federal funds, for instructional staff in buildings.** This is accomplished by examining the pupil-to-instructional staff ratio and the per-pupil instructional staffing expenditures. The district may compare schools by using one or more of the following methods:

- Compare schools of similar grade span
- Compare school-by-school across the district without regard to grade span,
- Compare schools with similar school enrollment. (This comparison would be made when there is a significant difference in the enrollments of schools. For example, when the largest school has an enrollment that is two times the enrollment of the smallest school.)

## Maintenance of Records

Every district must develop procedures for complying annually with the comparability requirements. The district must also maintain records that are updated biennially that document its compliance. For instance, if the district files a written assurance that it has established and implemented a district-wide salary schedule and policies to ensure equivalence among schools in staffing and in the provision of materials and supplies, it must keep records documenting that the salary schedule and policies were implemented and that equivalence was achieved among schools in staffing, materials and supplies.

## Comparability Study Worksheet, Instructions and Examples

Step by step instructions for completing the comparability study are printed with the [Comparability Worksheet \(Form 581-2306\)](#). The Comparability Worksheet is provided for district convenience and may be used as the reporting form or serve as a model. A district may design its own reporting form.

A district may also meet the comparability requirement using other measures, such as student/instructional staff ratio or student/instructional staff salary ratios.

The pupil-instructional staff ratio (number of children per FTE of instructional staff) is not to exceed 110 percent of any building (in its span, when compared among similar schools) and not to exceed 110 percent of the average pupil-to-instructional staff ratio of the non-Title I funded buildings. Per-child expenditures in each Title I building for non-federally funded instructional staff may be no less than 90% of any building (in its span, when compared among similar schools) and not to drop below 90% of the average expenditures among non-Title I funded buildings. Staff assigned solely for the purpose of providing services to children with disabilities and additional staff providing bilingual education for students with limited English proficiency may be excluded from non-federal expenditures within the comparability study.

## **Budget**

### **Estimated Budget in CIP Budget Narrative**

The district's CIP Budget Narrative/Spending Workbook for federal funds is due mid-May of each year. When the federal allocation and amounts are not available, the district must submit a budget in the CIP Budget Narrative that is based upon estimated amounts of compensatory education funding as opposed to actual dollar amounts. Directions and guidance are provided through out the CIP Budget Narrative <http://www.ode.state.or.us/search/results/?id=201>

### **Indirect Costs**

If the district intends to charge federal programs for indirect costs, it is best to submit a request for that purpose early enough to have received a rate for the coming year. Request the indirect rate in March or April. A district must receive a new rate each year. A previous year's rate may not be used. Requests are submitted to the Oregon Department of Education, Business Services. If the district has no approved indirect cost rate at the time the CIP Budget Narrative is submitted, the budget must not include that line item.

### **Final Budget Revision**

After receiving the exact amount of Title I funding on a Subgrant Award Notification (SANS) Form 581-3140a-X the district submits a revised CIP Narrative/Workbook so the final budget is based on actual Title allocations. If the district's request for an indirect cost is still pending when the thirty day period is at an end, a note must accompany the final budget to that effect and the district will be expected to file an Amended Consolidated Budget page.

### **Budget Amendment Approval Process**

If the district's planned expenditures change any Final Consolidated Budget line-item by 10% or more, an amended budget must be submitted. To submit an amended budget use the *CIP Budget Narrative/Spending Workbook*. The district must have approval from the Office of Educational Improvement and Innovation, Education Specialist with a knowledge of Title IA (refer to Chapter 1: Contacts), prior to implementing changes. Send an e-mail attachment or fax a copy of the *CIP Budget Narrative/Spending Workbook* showing the line-item changes, dated and marked "Amended," a brief statement describing the purpose of the change, and a copy of the original *CIP Budget Narrative* (from application submitted in Spring) to the Office of Educational Improvement and Innovation. Send the revision to person listed on the front cover of the CIP Budget Narrative.

## **Salary Equalization**

Districts may reserve the amount of dollars necessary to offset the differences in salary and benefits among staff members. This reserve is not intended for use by districts to pre-determine the amount of or type of staffing from one Title I building to another.

It is allowable as a means of allocating per child dollar amounts to buildings as though all certified staff members were earning the same wage and receiving the same benefits and/or instructional assistant staff were earning the same wage and receiving the same benefits. To accomplish this, the district holds in reserve sufficient funds to pay the differences among staff members, over and above the building allocation. Using this provision reduces the per child dollar amount allocated to buildings, but it prevents schools from being at a disadvantage for maintaining highly trained, experienced staff.

The process for determining the amount of a salary equalization reserve may vary. One way to accomplish this is for the district to add the amount of salary (and benefits cost when appropriate) current district Title I funded staff annually earn which exceeds entry level pay. That amount is deducted from the amount of Title I dollars to be allocated to eligible buildings and is held in reserve. Eligible Title I schools receive the building allocation appropriate to each school as determined by its rank order and per-child allocation. Schools are free to staff their Title I positions as though the costs of every teacher or instructional assistant were all at entry level. The district draws from its reserve of funds to cover the amount of staffing costs incurred at each building that exceed that entry level amount.

Some districts have determined a salary equalization reserve by calculating an average salary cost and holding in reserve that which exceeds the average. Others have held in reserve at the district level all costs for staffing and have proportioned staffing “units” as a means of equalizing the variation of cost among staff members.

Whatever method the district may select, a written description of the salary equalization process used and a demonstration that the building allocation process is compliant must be on file and available upon request by local auditors, federal auditors and/or the State Agency. Salary equalization is an optional set-aside. The district may fund each eligible building according to the per-child allocation in rank order and require schools to staff within their funding limits.

**The following is one example in developing equalization funding.**

**Heritage School District/Certified Salary Schedule:** (salaries not reflective of current district salary schedules in Oregon)

<b>Years Experience</b>	<b>24 Hrs. Credit</b>	<b>45 Hrs Credit</b>	<b>Masters</b>	<b>Masters/4-5</b>
0 25,000	26,500	28,000	32,000	35,000
1 26,500	28,000	29,500	33,500	36,500
2 28,000	29,500	31,000	35,000	38,000
(5) 32,500	34,000	35,500	39,500	42,500

The district established \$35,000 as the average salary, plus included the fringe benefits at 35% for a total of \$47,925.

The second step would be to incorporate the same salary schedule and criteria for classified personnel. It is the district's choice to include classified into the equalization formula. An example of a base formula for classified - \$24,000 plus 50% fringes = \$36,000.

Heritage School District chose to target five elementary schools for Title I services. The following is the targeting scenario:

School	Enrollment	F/R lunches	% Poverty	#/per-child	\$/Alloc. to bldgs.
Bardon	504	349	69	450	157,050
Oakly	388	201	52	400	80,400
Cherry	465	233	50	400	93,200
Winston	298	131	44	375	49,125
Evans	254	98	39	350	34,300
<b>TOTAL</b>					<b>414,074</b>

Here is how Bardon Elementary will be eligible to incorporate "equalization funding."

Bardon Elementary chooses to have (2) certified staff involved with Title I.

Mary Jones - certified salary amounts to \$38,000 plus fringe benefits/35% - \$51,300

Jim Dowd - certified salary amounts to \$36,000 plus fringe benefits/35% - \$47,250

Because Heritage School District established \$47,925 as the average certified salary in the district (includes salary plus fringe benefits) for Title I staff, Mary Jones' salary equals \$51,300 which is \$3,375 above the district average. Jim Dowd's salary equals \$47,250 which is \$675 above the district average. Through the district's Title I equalization funding formula, the district could then place \$4,040 (Mary's \$3,375 plus Jim's \$675) additional funds into the school for higher paid certified staff. Using the same formula procedure, Oakly, Cherry, Winston, and Evans would apply for the same equalization funding is applicable.

The classified formula for Equalization funding would be applied using \$21,000 as the average classified salary.

The total of all the Equalization Funds from each school would then be placed into the District Set-aside funds.

Remember, whatever is applied through Equalization lowers the total amount that can be placed into all buildings collectively. Equalization Funds lower the per-child designated amount that each building would initially receive. Equalization does not imply equal staff positions in each Title I Building.

**Heritage School District's final Title I Budget looks like this:**

**Total Grant Award from State - \$530,000**

District Set-Asides	
Administration	\$33,000
Equalization	21,000
Homeless	10,300

Allocation to Buildings		
		Equalization
Bardon	\$157,050	+4,050
Oakly	80,400	+9,000

Parent Involvement	16,375
Professional Dev.	18,325
Summer School	12,000
Neglected/Delinquent	5,000
Total	\$115,925

**Total Funds Allocated - \$530,000**

Cherry	93,200	+5,050
Winston	49,125	+2,900
Evans	34,400	0
Total	\$414,075	\$21,000

**Important:** these dollar amounts (per-child and total allocation) into each building were established after all set-asides were computed.

Based on an average certified salary position in a district, the following guidelines would apply in appropriately placing teachers into a Title I Program.

- ✓ Heritage School Districts average of certified salary/fringes = \$47,925
- ✓ One/1.0 FTE certified salary position would require a minimum of \$47,925 allocated into the school, based on the per-child dollar amount established by the district.
- ✓ Two/1.0 FTE would require minimum of \$95,850.
- ✓ Three/1.0 FTE would require minimum of \$143,775.

If a Title I school were allocated \$96,600 based on the per-child amount established by the district, then if one or both teachers exceeded the combined salary/fringes package of \$95,850, that school would then become eligible for the equalization funds.

**Sample:**

	<b>Dist. Ave. Salary</b>	<b>Actual Salary</b>	<b>Equal. Funds</b>
Linda Shore	47,925	52,000	4,025
Karen Blake	47,925	47,500	None

If the same school had been allocated only \$93,050 based on the per-child amount established by the district, then the district would not be able to place both of these teachers at the full 1.0 FTE salary position because the combined district average salary (\$95,850) exceeds the \$93,050 the building is to receive in allocation.



## **Carryover**

**Carryover** provides districts with an opportunity to spend Title IA funds approved for one project year in a subsequent year. Districts have authority to carry over up to 15% of their allocation to September 30 of the next school year. (Districts that receive less than \$50,000 in Title I funds are not subject to a carryover limitation.)

District may request a waiver from the 15% limitation once every three years. Waiver requests must be made in writing to the ODE Office of Educational Improvement and Innovation (EII) on district letterhead. Contact the EII office to determine the specific staff member (Chapter 1: Contacts) the waiver should be submitted to. The letter should indicate the amount or estimated amount of carryover, the percentage in relation to the original grant, a brief explanation of the factor(s) contributing to the carryover and a brief statement of how the funds will be used in the subsequent year. The waiver form is located at the following link:

[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_i/fiscal/carryoverwaiver.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_i/fiscal/carryoverwaiver.doc)

With the exception of reserves for Neglected or Delinquent programs, carryover funds resulting from less than expected expenditures in district reserves (e.g. parent involvement, homeless) may be redistributed for other purposes in the subsequent year.

Districts are advised to use carryover funds as early as possible. Refer to Title IA Reallocation in the following section of this chapter.

## **Title IA Reallocation**

### **Overview**

The vast majority of Title IA programs in Oregon effectively use their annual allocations, though for a variety of reasons, a very limited number of districts have excess funds remaining at the end of the project year. Because many districts would benefit from additional funds, the Oregon Department of Education implemented a process for reallocating excess funds to districts with demonstrated need and quality program plans.

Section 1126[c] of No Child Left Behind Act (NCLB) states:

**“Reallocation. If a State education agency determines that the amount of a grant a local educational agency would receive under sections 1124, 1124A and 1125 is more than such local agency will use, the State educational agency shall make the excess amount available to other local education agencies in the State that need additional funds in accordance with criteria established by the State education agency.”**

1. Each year usually no later than mid-October a district will submit a revised budget reflecting actual allocation for the upcoming fiscal year and an accurate carryover budget for the previous year’s allocation. In October, the Oregon Department of Education will review carryover funds to identify those districts with carryover in excess of fifteen percent (15%). For districts with an excess of 15% carryover and without current waiver authorization, the Office of Educational Improvement and Innovation will inform districts that all remaining funds from previous fiscal year in excess of 15% will revert back to the Oregon Department of Education for reallocation to other districts.

**Example:** Green Tree School District reports a carryover of \$14,500. The previous year’s allocation was \$72,500. The carryover is 20%. The district has not sought a waiver. The excess above 15% (5% = \$3,625) reverts to the ODE for reallocations to other schools.

2. In March of the second fiscal year (180 days after the end of the first fiscal year), the Office of Education Improvement and Innovation will inform districts with carryover funds that all remaining funds in excess of fifteen percent, without regard to waiver, will revert back to the Oregon Department of Education for reallocation to other local educational agencies.

### **Reallocation to LEAs**

Reallocation of funds will be to LEAs that:

1. Have been determined by the U.S. Department of Education as eligible for initial or additional funds as the result of a finding (Non-competitive).
2. Are in program improvement status and want to make greater use of the regional Title I School Support Team assistance and services. (Competitive).
3. Have demonstrated, through their LEA plan and application, the need for additional funding to support innovative programs or practices aligned with national and/or state Title I priorities. (Competitive).

## **Final Project Expenditure Report**

Detailed final Project Expenditure Reports should be completed and returned to the Office of Improvement and Innovation at ODE no later than 45 days after completion of the project number. Do not include carryover amounts in this report. If the school district takes the full 27 months (total grant period including carryover year) to complete the expenditures from the grant, the report would be due 45 days after September 30 of the second year of the grant. Final Project Expenditure Report forms are located on the ODE Title IA resource page [http://www.ode.state.or.us/opportunities/grants/nclb/title\\_i/fiscal](http://www.ode.state.or.us/opportunities/grants/nclb/title_i/fiscal)

**Note: This is a final report on this project.**

In the case that the school district has already requested the funds and the report shows actual expenditures which are less than the allocation, please attach a check for the difference.

If the school district has not requested the funds, the Oregon Department of Education Business Office will close the grant and the money becomes available to the Office of Educational Improvement and Innovation for reallocation.

## **Accounting for Schoolwide Programs**

District policies having to do with the procedures for tracking federal dollars will vary. The purpose of this section is to describe the authority of schoolwide programs under the No Child Left Behind Act of 2001 with regard to the combining of compensatory and regular education funds. District policies may be more restrictive, but cannot be less restrictive than the law allows.

Districts must keep Title I funds separate from all other federal, state and local funds and accounted for separately at every level of use except as Title I dollars are allocated to high poverty (40% or greater) schools which have undergone appropriate preparation and are designated as schoolwide programs.

Schoolwide programs have implemented a comprehensive restructuring plan which has been reviewed and is on file at the district office. Once operating as a Schoolwide Program, that school has the authority to combine Title I, Part A Improving Basic Programs; Title I, Part B, Even Start Family Literacy; with approval of the parents of Migrant students, Title I, Part C; Title IIA, Professional Development; Title IID Technology; Title III English Language Proficiency; Title IV-A Safe and Drug Free Schools; Title V-A Innovative Programs; Title X McKinney-Vento Homeless, and Perkins with state and local funds to improve the overall program of the school. No requirement exists for schoolwide programs to identify separate sources of funding for activities. The dollars may be combined and used to carry out the activities described within the Schoolwide Plan. Schoolwide Programs must meet Comparability requirements within the district.

Since the schoolwide program funds can be consolidated and used to support any expenditures of the schoolwide plan, supplanting in a schoolwide program is purely a **fiscal analysis**, not a program analysis.

A schoolwide program must use Title I funds only to supplement **the amount of funds** that would, in the absence of Title I, have been made available from nonfederal sources for the school. This includes funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency. The schoolwide program is not required to demonstrate that any particular service is supplemental to the services regularly provided in the school to all students.

The amount of Title I moneys allocated to a schoolwide program must be determined using appropriate funding procedures (See Chapter 6: Distribution of Title IA Funds) High poverty schools in the planning year are still to be considered targeted assistance programs and must, therefore, keep funding flows separate until the planning year is complete; the plan has been reviewed and is on file at the district office. All other requirements for targeted assistance programs must be upheld as well.

## **Accounting Procedures**

### **Audit**

#### **1. Recent Changes to Elementary and Secondary Act (ESEA)**

Currently Title IA programs have greater flexibility provided to the grantees:

**Schoolwide programs:** Schools with 40 percent poverty levels that elect to become schoolwide programs may combine federal education funds.

Submission of a consolidated plan to receive federal funds: LEAs may file single, consolidated plans that include many federal programs supporting elementary and secondary education, thus reducing program fragmentation. Submission of a consolidated plan (Continuous Improvement Plan, CIP), however, does not relieve LEAs of the program responsibilities described in the individual program statutes or regulations nor does it authorize combining of funds except in the case of a schoolwide program or consolidated administrative funds.

**Consolidation of administrative funds:** LEAs may consolidate funds received for administration of many federal education programs, thus eliminating the need to maintain separate time and effort records for LEA personnel who work on more than one federal program or otherwise account for these funds on a program-by-program basis.

**Under Ed-Flex,** Oregon (Oregon State Board of Education), has the authority to waive certain federal requirements affecting LEAs and schools

#### **2. Audit Authority**

The Inspector General of the USDE and the Comptroller General of the United States have authority by law to conduct audits of the use of Title IA funds. LEAs are required to return to the USDE any funds determined by federal audits not to have been spent in accordance with applicable law. Any LEA receiving Title IA funds must comply with single independent audits of financial operations including compliance provisions. Audits, usually conducted by local CPA firms, are conducted on an organization-wide basis, rather than grant-by-grant. The audit entails financial accounting and program regulation compliance.

#### **3. Audit Costs**

Costs are to be charged to the programs being audited as direct or indirect administrative costs. Of these costs, a proportionate share may be charged to the Title IA program.

#### **4. Audit Compliance Items**

Application: LEAs must submit to ODE an CIP Budget Narrative and Workbook for Title allocations within the No Child Left Behind Act, due mid-May of each year. ODE shall approve an LEA's application if the application includes a description of allowable programs to be conducted and assurances required under NCLB.

Allowable Program Activities: An LEA must use Title IA funds only to meet the costs of program activities that are designed to help participating children meet the state standards expected of all children. Allowable activities include but are not limited to: instructional

programs, counseling, mentoring, other pupil services, college and career awareness and preparation, services to prepare students for the transition from school to work, services to assist preschool children in the transition to elementary school programs, parental involvement activities, and professional staff development. If health, nutrition, and other social services are not otherwise available from other sources to participating children, Title IA funds may be used to provide such services.

Attendance Areas: Title IA programs shall be conducted in attendance areas of LEAs having the highest concentration of low-income children. If an LEA has a uniformly high concentration of low-income children, the programs may be in all attendance areas. See Administration, A.

Combined Fiscal Effort: Maintenance of effort must be at least 90 percent of the second preceding year, unless specifically waived by ODE. In that case, the waiver is for one fiscal year only.

Supplement/Supplant: Title IA funds may only supplement and to the extent practical, increase the level of funds that would, in the absence of Title I, be made available from nonfederal sources for the education of students participating in Title IA programs.

Comparability: An LEA may receive Title IA funds only if state and local funds will be used to provide services in program areas which are at least comparable to services being provided in areas not receiving Title IA funds. If all school attendance areas are designated at Title IA program areas, an LEA may receive Title IA funds only if state and local funds are used to provide services which are substantially comparable in each program area. An LEA may exclude state and local funds for special programs to meet the educational needs of educationally-deprived children consistent with the purposes of Title IA.

Assessments: The LEAs Title IA program at targeted assistance schools must be based on an annual assessment of the educational needs that identifies educationally-disadvantaged children in all eligible attendance areas, permits selection of those children who have the greatest need for special assistance and determines the needs of participating children with sufficient specificity to ensure concentration on those needs.

Private Schools: The LEA shall provide educationally-disadvantaged children who reside in a LEA program area and who are enrolled in private elementary and secondary schools with educational services and arrangements as will assure participation on an equitable basis of these children. If the LEA decides to serve educationally deprived, low-income children under Title I, the LEA must also provide Title I services to these children on an equitable basis.

Obligation of Title I funds: An LEA may obligate Title I funds only during the fiscal year for which the funds were appropriated and during the succeeding fiscal year.

Record Retention: LEAs must retain records for audit and evaluation for five years after the final expenditure report is submitted or until audit resolution is complete.

**Federal Circular No. – A-133 – Revised June 24, 1997**

<http://www.whitehouse.gov/omb/circulars/a133/a133.html>

**Federal Circular No. – A-87**

[http://www.whitehouse.gov/omb/circulars/a087/a87\\_2004.html](http://www.whitehouse.gov/omb/circulars/a087/a87_2004.html)

## **Equipment**

When Title I funds are used to purchase equipment consider:

- 3 Equipment purchased with Title I funds is the property of the district's Title I program.
- 3 Equipment may be housed and used in schools/sites where children are served by the Title I program.
- 3 Only in Title I schoolwide programs where the district has a policy allowing funds to be commingled may equipment be considered the property of a particular school.
- 3 Title I purchased equipment must be noted on a district maintained equipment inventory.
- 3 The equipment inventory must include a notation indicating the building/location of each Title I purchased equipment. This includes equipment in participating private schools.

When Title I purchased equipment must be relocated, sold or determined to be obsolete consider:

- 3 When Title I funded equipment is housed in a building that is no longer receiving a Title I allocation, that equipment must be moved to a location served by Title I.
- 3 The district may purchase equipment from the Title I program at a fair market value that was originally purchased by Title I funds. The equipment inventory should record the date of exchange.
- 3 Obsolete equipment should be marked as such, disposed of according to district policy and the equipment inventory should note the date of the process.
- 3 Records should be maintained for five years after any transfer/disposal of equipment from the Title I program.

## **Flexibility**

Since Improving America's Schools Act (IASA) the federal government has increasingly provided LEAs and State Education Agencies (SEAs) greater opportunities to use their funds in a more flexible manner and has provided more flexibility regarding some federal rules and regulation. These opportunities included:

- Waive most individual program requirements for schools that chose to combine funds in Title I schoolwide programs
- Allow SEAs and LEAs to consolidate their sub grant application and their administrative funds
- Allow SEAs and LEAs to apply to U.S. Department of Education for waivers of individual program requirements; and
- Under the "Ed-Flex" program, delegate to states the authority to waive *federal* statutes and regulations on behalf of their LEAs.
- Added in 2000 was the Rural Education Achievement Program (REAP) which allows small, rural LEAs to combine funds under certain formula grants and augments their small federal allocations with some extra funding.

**Key Resource:** [GUIDANCE ON THE TRANSFERABILITY AUTHORITY](http://www.ed.gov/programs/transferability/finalsummary04.doc)  
U.S. Department of Education June 8, 2004  
<http://www.ed.gov/programs/transferability/finalsummary04.doc>

### **Transfers by LEA**

LEAs have the flexibility to move a portion of the federal Title funds from one program to another. An eligible district may transfer up to 50% of the formula funds allocated in these Title programs:

- Title IIA Improving Teacher Quality
- Title IID Educational Technology
- Title IV Safe and Drug Free Schools and Communities
- Title V Innovative Programs

NOTE: LEAs may transfer funds from any of the above named programs to Title IA or Title III but may not transfer Title IA or Title III funds out to other programs.

Flexibility is limited when a LEA is in District Improvement status. An LEA in Improvement status may not transfer more than 30% of the funds allocated under the above mentioned programs. A key point for LEAs in Improvement status is that any funds transferred must be used for improvement activities consistent with section 1116(c).

An LEA identified for corrective action may not transfer funds and this loss of ability to transfer funds takes place immediately.

An LEA may transfer funds more than once during each year. The guidance recommends that each transfer is carefully considered and made after adequate planning.



**Before transferring funds an LEA must:**

- Consult with participating private schools to provide equitable participation of private school students and staff;
- Determine which funds are to be transferred and where they will be placed. This information is recorded on the Consolidated Spending page of the CIP Budget Narrative/Workbook.
- Modify each affected local plan or application to account for the transfer and
- Establish the date the transfer will be implemented.

The LEA must notify the Oregon Department of Education (ODE) of the transfer at least 30 days before the effective date of each transfer. If the transfer results in a significant change in the administration or operation of the plan/application a revised plan or application must be submitted within 30 days of the transfer.

**Rural Education Achievement Program (REAP) Title VIB**

REAP allows small rural LEAs to combine funds under certain formula grants. Previously before REAP, many small rural LEAs received such small amounts of funds for each program that the funds could not be used effectively for the purposes stated. Currently there are approximately 80 districts in Oregon eligible for the flexibility the Rural Education Achievement Program allows. In the nation there are approximately 4000 out of the 14,450 LEAs eligible for this program. REAP eligible districts complete the REAP CIP Budget Narrative in May rather than the regular CIP Budget Narrative. Refer to the REAP CIP Budget Narrative <http://www.ode.state.or.us/schoolimprovement/cdip/reapapp.doc> to determine which Title funds may be combined.

NCLB allows these LEAs to combine all, or if they choose just part of specific formula allocations and use them for certain NCLB purposes.

As with larger district these funds may be moved into Title IA but may not transfer funds out of Title IA.

**Eligibility Criteria**

The LEA must:

- Have a total average daily attendance (ADA) at all of its schools of fewer than 600 or each county in which a school served by the LEA is located, has a total population density of fewer than 10 persons per square mile and
- All schools served by the LEA have a school locale code of 7 or 8. These codes mean the community has fewer than 2,500 total residents and is coded “rural” by the U.S. Census Bureau.

The consideration of population density rather than ADA is new under NCLB. Another new element is the authority for the U.S. Department of Education to waive the second criterion if the LEA with the Oregon Department of Education’s concurrence, demonstrates that is located in an area defined as “rural” by a state governmental agency.

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# Oregon Title I Handbook

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## **CH. 6 Distribution of Title IA Funds: Selection, Ranking and Services**

### **General Selection Requirements**

1. An LEA must rank all of its school attendance areas according to their percent of poverty and must use the same measure of poverty for:
  - Identifying eligible school attendance areas.
  - Determining the ranking of each area.
  - Determining the allocation for each area.
  - The LEA must select a poverty measure from the following options:
    - Children ages 5-17 in poverty as counted in the most recent census data approved by the Secretary.
    - **Children eligible for free and reduced-priced lunches under the Richard B. Russell National School Lunch Act.** This is the most common method used since it is the data most readily attainable.
    - Children in families receiving assistance under the State program funded under Title IV, Part A of the Social Security Act (Temporary Assistance for Needy Families).
    - Children eligible to receive medical assistance under the Medicaid program.
    - A composite of any of the above measures.
  - An LEA must rank school attendance areas based on the percentage (not the number) of low-income children counted.
2. After an LEA has ranked all of its school attendance areas by poverty, the LEA must first serve, in rank order of poverty, its areas above 75 percent poverty, including any middle schools or high schools.
3. Only after an LEA has served all of its areas with a poverty rate above 75 percent may the LEA serve lower-ranked areas. The LEA has the option to (1) continue on with the district-wide ranking, or (2) rank remaining areas by grade span groupings.
  - The same district-wide poverty average must be used if the LEA chooses to rank schools in order without regard to grade span.
  - For ranking by grade span groupings, the LEA may use (1) the district-wide poverty average, or (2) the district-wide grade span poverty averages for the relevant grade span grouping.
  - If an LEA has no school attendance areas above 75 percent poverty, the LEA may rank district-wide or by grade span groupings.
  - An LEA's organization of its schools defines its grade span groupings. For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade span groupings would be grades K-5, 6-8, and 9-12. To the

extent an LEA has schools that overlap grade spans (e.g., K-5, K-8, 6-8), the LEA should include a school in the grade span in which it is most appropriate.

4. **Note:** An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to rank its school attendance areas.

#### LEA Discretion in Selecting Participating Areas and Schools

5. An LEA may--
- Designate as eligible a school in which at least 35 percent of the children are from low-income families--i.e., the "35 percent rule."
  - Use Part A funds in a school that does not serve an eligible school attendance area if the percentage of children from low-income families enrolled in the school is equal to or greater than the percentage of such children in a participating school attendance area of the LEA. This could be a magnet school or charter school that does not have a specific attendance area.
  - Elect not to serve an eligible school attendance area or school that has a higher percentage of children from low-income families (than a school that is served) **if --**
    - The school meets the Title I comparability requirements;
    - The school is receiving supplemental funds from other State or local sources that are spent according to the requirements of Sections 1114 or 1115; (**NOTE:** This does not apply to supplemental funds from other Federal sources, such as, CSR, 21<sup>st</sup> Century Learning Centers or Reading First) and
    - The funds expended from such other sources equal or exceed the amount that would be provided under Title I, Part A.
  - For one additional year only, designate and serve a school that is no longer eligible but was eligible and served in the preceding year.

#### Allocating Title I Funds to Participating Schools

6. An LEA must allocate Part A funds to participating school attendance areas or schools, in rank order, based on the total number of children from low-income families in each area or school. An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to allocate funds to areas or schools in rank order.
7. If an LEA serves any areas or schools below 35 percent poverty, the LEA must allocate to all its participating areas or schools an amount for each low-income child in each participating school attendance area or school that is at least 125 percent of the LEA's allocation per low-income child. Use process and worksheets in the following section "Determining Eligible Buildings"
- An LEA's allocation per low-income child is **the total LEA allocation under Title I Part A**, subpart 2 divided by the number of low-income children in the LEA as determined using the poverty measure selected by the LEA to identify eligible school attendance areas. The LEA then multiplies this per-child amount by 125 percent.

- An LEA calculates 125 percent of its allocation per low-income child before the LEA reserves any funds.
  - An LEA must allocate at least this amount for each low-income child in every school the LEA serves, not just for those schools below 35 percent poverty.
  - If remaining funds are not sufficient to fully fund the next ranked eligible school, the LEA may serve the school if it determines the funds are sufficient to enable children to make adequate progress toward meeting the State's challenging performance standards.
8. An LEA serving only areas or schools at or above 35 percent poverty must allocate funds in rank order, on the basis of the total number of low-income children in each area or school but is not required to allocate 125 percent of the LEA's allocation per low-income child (described in 7. above). **However, in determining what" per-child amount to allocate, the LEA should bear in mind the purpose of such funding--to enable children who are most at risk of not meeting the State's challenging student academic achievement standards. The per-child allocation amount must be large enough to provide a reasonable assurance that a school can operate a Title I program of sufficient quality to achieve that purpose.**
9. An LEA is not required to allocate the same per-child amount to each school. However, the LEA must allocate a higher per-child amount to schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.
10. An LEA that opts to serve schools below 75 percent poverty using grade span groupings may determine different per-child amounts for different grade spans so long as those amounts do not exceed the amount allocated to any area or school above 75 percent poverty. Per-child amounts within grade spans may also vary so long as the LEA allocates higher per-child amounts to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.

The U.S. Department of Education's Non Regulatory Guidance titled: Local Educational Agency Identification and Selection of School Attendance Areas AND SCHOOLS and Allocation of Title I Funds to Those Areas AND Schools, August 2003 is the basis of the general guidelines provided in this section. Answers to frequently asked questions regarding the identification and selection of schools for Title I funding are located in this guidance and can be found at the U.S. Department of Education website at: <http://www.ed.gov/programs/titleiparta/wdag.doc> and on the Oregon Department of Education website on the Title IA home page under Resources . <http://www.ode.state.or.us/search/results/?id=95>

## **Targeting and Funding Schools for Title I Part A Programs**

### **Establishment of Eligible Buildings (Targeting)**

As stated in the previous section an LEA with 1,000 students, and more than one school at any grade level must determine which buildings will be eligible to receive Title I dollars. An LEA with fewer than 1,000 students or only one building per grade span is not required to follow the targeting process. Such district has complete flexibility to distribute funds in whatever configurations best serve disadvantaged students within their LEA.

### **STEP ONE: Establishing Poverty Levels**

**A. The district must first decide what poverty criteria will be used and when the measure of poverty will be taken. Every school in the district is compared by the same criteria, measured at the same time of the year. Refer to General Selection Criteria for all criteria allowable.**

- ⇒ **Eligibility for Free and Reduced Lunch programs:** This is the criteria used by most school districts in Oregon and in the nation. The data is available locally and also provides the broadest range of eligibility. Families may have incomes above the national poverty level and still be eligible for reduced lunch rates. When districts choose to use free and reduced lunch eligibility as the criteria for targeting schools they will include limited income working families as well as those at the deepest levels of poverty within each school's poverty percentage. Students do not have to be participating in a free/reduced meal program to be counted, but they must be eligible to participate.
- ⇒ **A Composite:** Districts may combine two or more of the sources of information for use as its poverty criteria. It must take care not to count the same children twice, however. Typically, free and reduced lunch count will be used for grades one through twelve and AFDC used for kindergarten.

2. The district must determine a time when the poverty criteria will be applied across the district in order to determine a uniform poverty count. The district may choose a single date and take a poverty count, or the district may choose to select a series of dates or a span of time during which it will average poverty. The series of dates or the span of time must be the same for all schools. For example, one district may choose to take a poverty count on the first Monday of February. Another district may choose to average the poverty counts taken for each school on the first Wednesdays of October, December and February. Yet another district may choose to use the average poverty for each school during the month of November. Any date selection method is acceptable so long as it is uniformly applied. Most districts look at patterns of poverty enrollment over time and select the period of time when poverty tends to be highest in the district as a whole

**B. Apply the poverty criteria - Determine poverty levels by numbers of students from low income families and percentages of poverty. This has to be done for the district as a whole and for each school.**

1. Establish poverty for the district by counting the number of children in poverty (based on the criteria selected and the dates established in Step One - A). Children must live within the district boundary. This count should include those children who are considered to be living in poverty and who are attending private as well as public school. (There is no obligation to include in the count children who are home-schooled.) To determine a percentage of district poverty, divide the number of poverty students by the total student enrollment of the district.

There is an additional option for large districts with more than one school at each grade level. Rather than establishing one district poverty average against which all schools are compared, the large districts may establish a district average of poverty for each grade span.

For example, a district may establish an average of poverty for all of its elementary schools by dividing the total number of children enrolled in the district's elementary schools into the total number of poverty children living in those elementary school attendance boundaries, then repeat the process to establish district poverty levels for the middle schools, then the high schools.

2. Establish the poverty level of each school. The district may establish the level of poverty in one of two ways:

**Attendance area:** Identify the total number of children living in each school attendance boundary or area. Within the total, identify the number of children living in poverty who live within each school attendance area. Include the number of children from poverty residences within each school boundary who attend private school. Divide the total number of poverty students living in each school attendance area by the total number of children who live in each attendance area and attend public school. Using residence in a school attendance boundary is the primary and preferred method for establishing school poverty levels.

**School Enrollment:** When a district has an open enrollment policy (*to accommodate magnet schools or some form of school choice*) it may not have residential attendance boundaries identified for each school, or there may be so much crossing of boundaries by students that the poverty of individual schools can only be determined by who attends each school. Identify the total number of children attending each public school. Determine the number of children attending each school who live in a family with poverty level income. Divide the number of poverty students at the school by the total number of students at the school to determine the school's poverty percent. When school enrollment is used to determine the poverty level of each school, the district must still identify the total number of poverty children from the district as a whole who attend participating private schools. Using school enrollment has implications for the funding of services to private schools, as well. Refer to Step Five and Illustration VII notes.

Another choice for the district in determining the poverty level of its schools exists. The LEA may choose to apply a feeder school pattern in order to establish poverty percentages for its middle and high schools.

**Applying a feeder school pattern:** In applying a feeder school pattern calculate the average percentage of poverty for elementary attendance areas or schools feeding into a particular middle school by dividing the total number of low-income children in those

elementary schools by the total enrollment of the same set of elementary schools. Multiply that percent (*which is an average for the schools feeding into a particular middle school*) times the total enrollment of that middle school. If an elementary school feeds into two or more middle schools, it will be necessary to calculate that elementary school as though it were two (or more) boundaries and multiply the appropriate percentages toward the receiving middle schools. For example:

**Illustration I**

Elementary School	Enrollment	# low-income	Feeds to Middle School...
Blueberry ES	313	210	Jefferson
Grant ES	377	247	Blossom Fields
Shaker Heights ES	298	186	Blossom Fields
Washington ES	555	282	Jefferson
Mulberry ES	319	141	split between JMS & BFMS
MES (Mulberry)	110	24	Jefferson (JMS)
	209	117	Blossom Fields (BFMS)

**Calculating Poverty for Jefferson MS:** Add the feeder schools poverty counts, (210 + 282 + 24) 516, divide that sum by feeder schools total enrollments (313 + 555 + 110) 978 to determine a percentage of poverty for Jefferson MS = 53% poverty. Multiply enrollment at Jefferson MS by 53% to determine the number of students who will generate funds for determining the building allocation, if any. Repeat the process for Blossom Fields MS.

If the district has only one high school, the elementary school grade span average may be applied to the high school as its percent of poverty. If there is more than one high school, follow the same procedures outlined above, using the middle school poverty percentages to determine the percent and number of poverty students at each high school.

**Reminder:** Whether or not a feeder pattern is used, the district is still under obligation to determine the number of low-income children attending private schools. In the previous illustration, if the district’s poverty data were derived from residence within school attendance areas and Jefferson Middle School were to be served but Blossom Fields not, low-income residence of Jefferson MS boundary would generate funds for serving eligible private school children. If, however, this poverty data were derived from school enrollment, every low-income middle school student attending private school and living within the district boundary would generate funds for serving eligible private school students.

**STEP TWO: Determining Which Schools Will Be Eligible for Title IA Funds**

- A. The district has one of two choices.**
  - It may identify schools eligible for Title I A funds as those schools with poverty percentages that are at or above the district average **or**
  - the district may identify schools with 35% or greater poverty as eligible for Title I A funds.
- B. When the LEA’s poverty average is below 35% and the LEA chooses to serve with IA funds schools above the LEA’s average but below 35%, it limits flexibility otherwise allowable in the funding process and the LEA must then follow the 125% formula.** See Step Four for an explanation of this formula.

**C. Note** NCLB does *allow* for one additional year only, to designate and serve a school that is no longer eligible but was eligible and served in the preceding year.

### **STEP THREE: Determining the Amount of Title IA Funds Necessary for District Level Set-Asides**

#### **General Requirements**

- A. Typically LEAs set-aside or reserve funds at the district level for serving students who reside in institutions for neglected or delinquent youth, for serving homeless students, for parent involvement, for highly qualified teacher commitments or School Choice or Supplemental Educational Services, extended learning opportunities or administrative costs. Some set-asides are required, others are optional. Schools in Title IA School Improvement status as well as, districts in District Improvement status have specific percentage of Title IA funds that must be set-aside for specific purposes. For detailed information regarding School Improvement set-aside requirements refer to:  
[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_1/a\\_basicprograms/schoolimprovement/schimpresmanualrev904.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_1/a_basicprograms/schoolimprovement/schimpresmanualrev904.doc)
- B. If a district decides to serve a school or schools that have 35% or lower poverty the district must calculate 125 percent of its allocation per low-income child before the determining the amount of Title IA funds to be used for District Set-Asides. See STEP FOUR.
- C. If a district transfers funds from another Federal Title program into Title IA under the Transferability provision in the CIP Budget Narrative, then the additional amount transferred is added to the LEA's Title I, Part A allocation, and the combined amount becomes the base for calculating the required set-asides for choice-related transportation and supplemental educational services, professional development, and parent involvement and the 125% formula.
- D. Because the set aside of funds by a district will reduce the funds available for distribution to participating areas and schools, the district must consult with teachers, pupil services personnel (where appropriate), principals, and parents of children in participating schools in determining, as part of its LEA plan, what set-asides are needed. This issue must also be part of the consultation with private school officials before an LEA makes any decisions that affect the opportunities of eligible private school children to participate in Title I A programs.
- E. A district must also ensure that it provides equitable services to private school children from Title I funds reserved "off the top" for district-wide instructional programs. If the district creates set-asides for district-wide instructional programs, the equitable services requirement applies. Title I regulations requires that, if an LEA reserves funds for instructional activities for public elementary or secondary school students at the district level, the LEA must provide equitable services to eligible private school children. The district bases equitable services from the reserved funds on the proportion of private school children from low-income families residing in participating public school attendance areas. The [Equitable Services Worksheet](#) may be used to determine the appropriate equitable reserve.



## **District Funding Set-Asides**

Because the reservation of funds by an LEA will reduce the funds available for distribution to participating schools, the LEA must consult with teachers, pupil services personnel (where appropriate), principals, and parents of children in participating schools in determining, as part of its LEA plan, what Set-Asides are needed. This issue must also be part of the consultation with private school officials before an LEA makes any decisions that affect the opportunities of eligible private school children to participate in Part A programs.

Most Title I money goes directly to eligible schools for direct services to children. There are instances, however, where a portion of Title I dollars may be held for use at the district level. For the most part, district level reserves are optional; in some situations setting aside funds for district-wide purposes is required.

An LEA must also ensure that it provides equitable services to private school children from Title I funds “set-aside” for district-wide instructional programs. The [Private School Equitable Service Worksheet](#) is provided to help the LEA in determining the correct private school allocations.

**Administrative Costs:** LEAs may bear the cost of Title I program administration or those expenses may be reserved from the Title I allocation before allocating dollars to buildings. Administrative costs may include staffing to administer Part A programs for public and private school children, support staff assistance and other expenses encumbered to carry out the administration of Title I services throughout the district for public and private school children. The amount of administrative expenses varies greatly from district to district and is verified as allowable during the Title I monitoring process. As a rule, a district with a Title IA grant of \$500,000 or more is expected to need a staff member assigned at least .5 FTE for the purposes of administering the grant. No more than 15% of total Title IA allocation are expected to be used for administrative costs.

**Salary Equalization:** This set-aside gives schools the ability to staff at will, regardless of salary levels. Refer to Salary Equalization in Chapter 5 Fiscal Management for additional information.

**Homeless Children and Youth:** Children who are homeless are automatically eligible for Title I services whether or not they are enrolled in the LEA and/or in a Title I funded building. For this purpose a district level set-aside of funds is necessary.

<http://www.ode.state.or.us/search/results/?id=113> A Homeless Liaison is required for each Oregon LEA. Title IA funds may be used to fund the liaison. Educationally related support services to children in shelters and other locations where homeless children may live is allowable.

**Neglected or Delinquent Youth:** The LEA has a responsibility to provide services comparable to those provided to children in Title I funded schools to serve children in local institutions for neglected children and provide if appropriate services to children in local institutions for delinquent children and/or neglected and delinquent children in community day school programs.

The amount of Title I-A dollars to be reserved for serving children and youth in this category is established by the numbers reported in a fall survey. The average state per child amount of Title I-A funding is multiplied by the reported numbers of neglected or delinquent children and

youth to determine each district's N or D reserve. The district's Notification of Project Approval, Form 3140, specifies the amount, if any, that must be set-aside and used for these purposes.

**Parent Involvement:** All districts with Title IA funds are required to carry out the mandates specified in NCLB Section 1118 for parent involvement. Districts with Title IA grants of \$500,000 or more are required to set aside a minimum of 1% of their Title IA dollars to carry out these activities. All districts may reserve Title I funds for these purposes.

**NOTE: New NCLB Requirement:** In addition to district-wide parent involvement activities, parent involvement activities must be carried out at the building level. NCLB requires that 95% of the Parent Involvement set-aside be placed back into the schools for parent involvement activities.

**Professional Development:** Title IA funds may be used to provide high quality professional development. Professional development funds may be required by NCLB if a district has schools in Title IA School Improvement status or if the district is in District Improvement status.

- If the District has been identified for improvement the district must reserve at least 10 percent of its Title I, Part A allocation professional development purpose; [Section 1116(c)(7)(A)(iii)]. Funds may be used to provide professional development for administrators, certified and classified staff.
- The district must reserve at least 5% of the Title IA allocation to meet the needs of the teachers who are not highly qualified, unless all staff meet the highly qualified requirements as determined by Teachers Standards and Practices [Section 1119(l)]

**Attracting and Retention of Qualified and Effective Teachers:** Provide, where appropriate under section 1113(c)(4) of the Title I statute, not more than 5 percent of its Part A allocation for financial incentives and rewards to teachers who serve students in Title I schools identified for school improvement, corrective action, and restructuring, for the purpose of attracting and retaining qualified and effective teachers.

**If the LEA has schools in School Improvement Status – Required Set-Asides**

The LEA must reserve and spend an amount equal to 20 percent of its Title I, Part A allocation, unless a lesser amount is needed to meet the requirements for choice-related transportation and supplemental educational services (Sec 1116(b)(10) and 1116(e)(6)) unless the LEA meets these requirements with non-Title I funds.

Of this amount, 5 percent must support choice-related transportation, 5 percent must support providing supplemental educational services, and the remaining 10 percent may support the costs of providing either choice-related transportation or supplemental educational services.

[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_1/a\\_basicprograms/schoolimprovement/schimpresmanualrev904.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_1/a_basicprograms/schoolimprovement/schimpresmanualrev904.doc)

**Extended Learning Opportunities:** LEAs may wish to reserve funds for other authorized activities that are more appropriately carried out at the district level than from a particular school's allocation of funds, these activities may include preschool programs, summer school and intersession programs. Serving Preschool Children under Title I guidance is located at the following address <http://www.ed.gov/policy/elsec/guid/preschoolguidance.doc>

**STEP FOUR: Computing the Title I-A Per-child Allocation**

The correct process to use for determining the per-child allocation amount(s) to be distributed to eligible buildings and to be held in reserve for serving eligible students attending private schools depends on whether or not the district poverty average is below 35% and if the district has decided to serve eligible schools below 35% poverty.

**WHEN ALL ELIGIBLE SCHOOLS are - 35% OR GREATER POVERTY**

A. When ALL eligible schools are 35% or greater poverty the district has a great deal of flexibility in determining the appropriate per-child allocation(s). The Oregon Department of Education recommends using no less than what would be the “average” Title I A per-child amount (*the average can be calculated by taking the total amount of Title IA funds after fund reserves have been set-aside and dividing that dollar amount by the number of children in poverty in eligible schools*). Districts should be aware that on average, Oregon distributes more than \$800. for every Title IA “formula” child. The district should be concerned when considerably less than that amount is being considered as an “appropriate” per-child Title IA allocation in schools of high poverty.

1. **The district may choose to allocate the same per-child amount** to each eligible building or it may choose to vary the Title IA per-child allocation from building to building; or grade span to grade span or both.

Using the same per-child Title I allocation: When the range of poverty from building to building is not significantly different, and when the size of district schools is also similar, a district may decide to provide the same Title I per-child allocation for each eligible building being served. Although the “average” per-child amount is recommended, a district has a great deal of flexibility in determining an appropriate amount as in the following illustration.

**Illustration II**

**Funding Schools Above 35% poverty, Using School Attendance Area, in Order Without Regard to Grade Span,**

# private school poverty student count			% Poverty	Building allocation \$845 per-child multiplied by # of poverty	Private School Reserve (Per-child multiplied by # of private school poverty students)	Funds available
# public school poverty student count						
Total Building Enrollment						
<b>LEA Totals</b>	4,448	1928	19	44%	\$16,226	<b>\$806,176</b>
<b>Blueberry ES</b>	313	<b>210</b>	<b>0</b>	67%	179,340	0
<b>Grant ES</b>	377	<b>247</b>	<b>2</b>	66%	210,938	1,708
<b>Shaker Heights ES</b>	298	<b>186</b>	<b>5</b>	64%	158,844	4,270
<b>Washington ES</b>	555	<b>282</b>	<b>12</b>	53%	240,828	10,248
<b>Jefferson MS</b>	551	270	0	49%	<b>0</b>	
<b>Mulberry ES</b>	319	141	3	45%	<b>0</b>	
<b>Blossom Fields MS</b>	515	222	0	43%	<b>0</b>	
<b>Mill Prairie ES</b>	225	45	14	26%	<b>0</b>	

<b>Joseph Box HS</b>	1295	325	12	26%	<b>0</b>	
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In this example, the district receives \$1,000,000 in Title IA funds. It has used school attendance boundaries; therefore, when calculating the average per child allocation, the district uses the total poverty student count (public and private) in eligible and served schools. The district reserves \$193,824 in set-asides leaving \$806,176 to distribute to eligible public schools and for the private school reserve. \$806,176 divided by the sum of the poverty count in the eligible and served attendance boundaries (944) (210, 247 +2, 186 + 5, 282 +12) equals \$854 per-child.

2. **The district may choose to vary the per-child Title I allocation.** When the range of poverty among the Title I eligible schools is wide and/or schools vary in size, particularly from grade span to grade span, it may be advisable to provide varying per-child amounts to eligible buildings. **Note:** The highest poverty schools must always receive the highest per-child allocation amounts.

- a) One option districts have is to **vary the amounts depending upon the degree of poverty** in each school (*without regard to grade span differences*) as in the following illustration.

**Illustration III**

**Funding Schools At or Above 35% Poverty, Using Residence in School Attendance Area, in Order Without Regard to Grade Span, Varying Per Child Amounts**

	# private school poverty student count		Total Building Enrollment	% Poverty	Per-child Allocation	Building allocation multiplied by # of poverty	Private School Reserve (Per-child multiplied by # of private school poverty students)	
	# public school poverty student count						Funds available	
<b>LEA Totals</b>	4,248	1,860	25	44%	\$575 (avg.)		\$11,450	<b>\$874,232</b>
Ocean Waves ES	113	101	0	89%	1000	\$101,000	0	773,232
Ocean Crest ES	377	274	2	73%	600	164,400	1,200	607,632
Tidepool ES	298	191	5	66%	500	95,500	2,500	509,632
Shoreline ES	555	292	12	55%	450	131,400	5,400	372,832
Driftwood MS.	551	270	2	49%	400	108,000	800	264,032
Seaview ES	319	143	3	46%	400	57,200	1,200	205,632
Coast Waters MS	515	222	1	43%	350	77,700	350	127,582 redistribute
Beach HS	1295	342	12	27%		n/a		
Surftides ES	225	25	14	17%		n/a		

- b) If the district decides to **vary the amount from grade span to grade span** it may determine, for example, that it will fund all eligible elementary schools at \$1200 per poverty child and all eligible middle schools at \$400 per poverty child and its eligible high school at \$200 per poverty child.

**Illustration IV**

	% Poverty	Per-child Allocation
<b>ELEMENTARY</b>		
Blueberry ES	67%	\$1,200
Grant ES	66%	\$1,200

Shaker Heights ES	64%	\$1,200
Washington ES	53%	\$1,200
Mulberry ES	45%	\$1,200
Mill Prairie ES	26%	0
<b>MIDDLE (using feeder school pattern)</b>		
Blossom Fields MS	62%	400
Jefferson MS	53%	400
<b>HIGH (using feeder school pattern)</b>		
Joseph Box HS	57%	200

An exception to this option occurs when a middle or high school has a poverty percentage at or above 75%. In this case, the middle or high school may not receive less per child than the level of any 75% or greater elementary school(s).

- c) The opportunity exists to **vary funding by grade span and within each grade span**, as well. Always, the highest poverty schools must receive the greatest per-child allocations except that the earliest grade span may be funded at the highest rate, even if the highest poverty school of the next grade span exceeds the percent of the lower elementary schools (*The exception noted above is the same in this instance, as well*).

*Illustration V*

School	% poverty	Per child Allocation
<b>ELEMENTARY</b>		
Dusty Plains ES	78%	1,200
High Desert ES	73%	1,000
Sagebrush ES	52%	800
Dry Gulch ES	41%	700
Grassy Meadow ES	32%	0
Oasis ES	19%	0
<b>MIDDLE</b>		
Cactus MS	55%	400
Desert Sage MS	37%	300
<b>HIGH</b>		
Lost Lake HS	38%	200

**WHEN FUNDING SCHOOL(S) BELOW 35% POVERTY – The 125% RULE**

If an LEA serves any areas or schools below 35 percent poverty, the LEA must allocate to all its Title I funded schools an amount for each low-income child in each participating school attendance area or school that is at least 125 percent of the LEA's allocation per low-income child.

To establish the minimum per-child allocation, apply the following formula:

- Using LEA selected poverty criteria (*Step One*), identify the total number of poverty students in the district as a whole.
- Next, divide the total LEA Title IA allocation (before removing set-asides) by the number of poverty students in the LEA as a whole (*including those attending private schools*) to get an average (*note that the process for determining this Title IA*

“average” is different from the process used when no school to be served is below 35% poverty).

- Finally, multiply the average per child amount by 125%. This product becomes the minimum per poverty child allocation that may be placed in any building served by Title IA. Schools may receive a greater amount per child, but not less. NCLB now allows if remaining funds are not sufficient to fully fund the next ranked eligible school, the LEA may serve the school if the LEA determines the funds are sufficient to enable children to make adequate progress toward meeting the State's challenging performance standards.

Example:

- School District 100J receives \$500,000 in Title IA funds. District total enrollment is 2,200. District poverty count (including those with residence inside the district boundary who attend private school) is 520. \$500,000 Title IA dollars, divided by 520 poverty students who live in the district produces an average Title IA per poverty child average of \$961.54. \$961.54 multiplied by 125% produces a minimum per child allocation of \$1202. (The decision to round numbers to the nearest cent or dollar, up or down resides at the LEA level and is usually determined by the size of the LEA and sophistication of the technology employed.)

**Illustration VI**

# private school poverty student count			# public school poverty student count	% Poverty	Building allocation \$1202 (minimum) per-child multiplied by # of poverty	Private School Reserve (Per-child multiplied by # of private school poverty students)	Funds available (\$500,000 less \$70,000 in set-asides)
Total Building Enrollment							
<b>LEA Totals</b>	2,200	510	6	23%			\$430,000
<b>101 ES</b>	300	<b>122</b>	0	41%	\$146,644	0	283,356
<b>102 ES</b>	350	<b>88</b>	1	25%	105,776	1202	176,378
<b>104 MS</b>	400	<b>92</b>	0	*23%	110,584	0	**65,794
<b>105 HS</b>	700	<b>161</b>	0	*23%			
<b>103 ES</b>	450	49	7	12%			

\*Middle and high schools poverty levels established using a feeder school pattern.

\*\*Insufficient funds remain to fully fund the next school in rank order (105 HS) so the remaining funds may be redistributed among the funded schools or district may decide to partially fund 105 HS. Refer to:

Local Educational Agency Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools

Non-Regulatory Guidance August 2003

<http://www.ed.gov/programs/titleiparta/wdag.doc>

- The district could choose to increase the per-child amount from the minimum, but no school could receive less than minimum per child. For instance:

**Illustration VII**

	# private school poverty student count					Building allocation		
	# public school poverty student count					Per child multiplied by # of poverty	Private School Reserve (Per-child multiplied by # of private school poverty students)	Funds available (\$500,000 less \$70,000 in set-asides)
Total Building Enrollment			% Poverty	Per-child Allocation*				
<b>LEA Totals</b>	2,200	510	6	23%				\$430,000
<b>101 ES</b>	300	122	0	41%	1,625	\$198,250	0	231,750
<b>102 ES</b>	350	88	1	25%	1,375	121,000	1,375	109,375
<b>104 MS</b>	400	92	0	*23%	1,202	110,584	0	**<1,209>
<b>105 HS</b>	700	161	0	*23%	1,202			
<b>103 ES</b>	450	49	7	12%	0		*** 0	

\*At \$1202 minimum per-child.

\*\*Although the amount remaining to provide funds for 104 MS is \$1,184. less than the full amount, the total lacking is less than one “per-child” allocation and may be drawn from administrative or other reserves. This district would also have the option of not funding 104 MS or 105 HS and redistributing the remaining \$109,400 between the two elementary schools served. The process for re-distribution is described in the Sixth Step.

\*\*\***NOTE:** If this district were determining its schools’ poverty percentages by enrollment rather than establishing eligible attendance areas, the district would be required to reserve funds for serving eligible private school students based on a count of ALL the poverty children attending private schools, not just those living in eligible school attendance boundaries.

**STEP FIVE: Determining Which Eligible Schools Will Be Served**

- A. The district totals the dollar amounts necessary for district level set-asides and subtracts that total amount from the Title IA allocation. (Refer to Step Three).

**Note:** At this point the dollar amounts necessary to provide services for eligible children attending private schools are not yet removed. See Step Five, D.

- B. The district places eligible schools in rank order by the percent of poverty in each school, including in the percentages the numbers of children from each school attendance boundary who are low-income and who attend private school, highest poverty schools ranking first. Schools may be placed in rank order of poverty in separate grade spans, or they may be ranked individually without regard to grade spans. The Step Four has several examples of schools placed in rank order with and without regard to grade spans.

**Note:** If the district determines that it is too cumbersome to include the count of low-income children attending private schools in its process of placing public schools in rank order, the district may choose to determine the poverty percentage of public schools based on public school poverty data alone. It is still necessary for the district to determine the number of low-income children attending private schools and

amount of funding that must be reserved for serving eligible children attending private schools. See Step Five, D.

- C. The district determines each building allocation by multiplying the established per-child Title I amount by the NUMBER of poverty students in each eligible building. (See Step Four examples).
- D. To reserve funds for serving private school students the district multiplies the established per-child amount by the number of students in poverty.

**When the district has established school attendance boundaries:** multiply the number of low-income children who reside in eligible school attendance areas and attend private school by the per-child amount determined for each served school in which the private school low-income child resides. (Several examples of this process are provided in the Step Four.)

**When the district has determined public school poverty levels by building enrollment:** multiply the highest per-child allocation amount provided to the highest poverty public school(s) times the number of low-income children who reside in the district boundary. This generates the fund reserves for serving eligible children attending participating private schools.


*Note: The children who generate the fund reserves are not necessarily the children who are considered “eligible” and receive Title I provided services. Eligibility for services is based on academic performance.*

### STEP SIX: Funds Distribution

- A. The district, drawing from the amount of Title IA funds after removing set-asides (at this point, including the reserves for private school service), fully funds any/all schools with 75% or greater poverty no matter what grade span. A district may serve only those schools with 75% or greater poverty, regardless of how many other buildings are “eligible,” but if the district places schools in rank order by grade span, the district may not skip over a 75% or greater poverty building in order to provide a higher level of funds in another grade span. **First fund ALL schools with 75% or greater poverty, and fund them at the highest per-child amount.** Even though School D is an elementary school, it may not receive a higher per-child amount than Middle School L or High School O.

For instance: **Illustration VIII**

Elementary Schools	% poverty	Middle Schools	% poverty	High Schools	% poverty
A	98%	L	79%	O	75%
B	85%	M	53%	P	44%
C	77%	N	52%	Q	40%
D	75%				
E	69%				
F	60%				
G	60%				
H	59%				
I	55%				
J	51%				
K	42%				

 = schools served



**B.** If funds remain after serving all schools with 75% or greater poverty, remaining eligible schools (*those below 75% poverty*) may be funded in order by grade span or without regard to grade span. If placing remaining schools in rank order by grade span, only after serving all schools with 75% or greater poverty may the district give preference to serving at the earliest grades.

**Note:** In the previous example, the district average of poverty is 57%. The district may determine all of its schools eligible for Title IA using the 35% eligibility criteria, or it may select as eligible all schools at or above the 57% district average. In either case, if the district serves all of its eligible schools, it faces the challenge of spreading Title I funds very thin causing the level of service to be less than ideal for creating academically strong Title I schools.

**C.** Redistributing remaining funds: When applying the 125% formula to funding schools, districts will often find that one or more eligible buildings remain but there are insufficient funds to “fully fund” the next eligible building. When this occurs, it is necessary to redistribute the remaining Title IA dollars into buildings which are funded as in the following example.

**Illustration IX**

School	# public school poverty	# private school poverty	% Poverty	Building allocation		Total Building Allocation		
				(\$1202 per-child multiplied by # of poverty)	Private School Reserve (Per child multiplied by # of poverty)	Funds available (\$500,000 less \$70,000)	\$65,794 re-distributed at \$217 per-child	PLUS \$1419 (1202 + 217) reserve for serving private school
						\$430,000		* see note
101 ES	122	0	41%	\$146,644	0	283,356	26,474	173,118
102 ES	88	1	25%	105,776	1202	176,378	19,096	124,872
104MS	92	0	23%*	110,584	0	65,794	19,964	130,548
105 HS	161	0	23%*					
103 ES	47	5	12%					

In this example, to redistribute remaining funds, add the number of low-income (*public & private*) from the three schools served ( $122 + 88 + 92 + 1$ ) 303. Divide remaining funds \$65,794 by 303 for a per-child re-distribution amount of \$217. Subtract from \$65,794 the amount of re-distribution money available for the private school reserve - in this case \$217 because there is only a count of one. Next, multiply \$217 times the number of low-income children in each serve school to determine the additional funds these schools will receive through re-distribution. The remaining \$43 may be factored into the re-

distribution by not rounding down to the dollar as was done in this example, or it may be added to a district level reserve such as that set-aside for serving homeless children.

The 125% formula requirement was met with the first distribution of funds so that the district has discretion in re-distribution. If varying per-child allocations are provided, the district may choose to vary the amount of the re-distribution per-child amount, as well. The principle that requires schools of highest poverty to receive the largest per-child allocation is still in place

.

# Oregon Title I Handbook

## **CH. 7 PROGRAM DESIGN**

### **General Information and Types of Design**

<b>1965 to 1978</b>	Design and implementation of Title I is a local decision. Auditors find a few instances of gross misuse of funds. They find more instances of services not going to the students most in need or not being used to provide supplemental, additional services. Efforts to clean up programs lead to the widespread misunderstanding that Title I requires curriculum, materials, staff, and space that are entirely different and separate from the school's regular program. Pullout programs become the standard.
<b>1978</b>	In amendments to Title I, Congress explicitly states that Title I does not require any specific model.
<b>1981</b>	Several examples of allowable Title I models are provided in non-regulatory guidelines.
<b>1985 to 1988</b>	The USDE, researchers in reading, critics of Chapter I, reviewers of Chapter I preparing Congress for reauthorization, and proponents of their own models for the education for the disadvantaged all urge in-class service to reduce the fragmentation of instruction for low-achieving students. In practice, pull-out programs remain the norm.
<b>1990</b>	Additional examples of legal models are provided in the Chapter I policy manual. State Departments of Education produce guidance documents urging in-class programs and/or offering examples from a range of allowable models. The USDE encourages preschool programs, extended-time strategies and innovation.
<b>1994</b>	The Improving America's Schools Act is passed into law and calls for Title I programs to "use effective instructional strategies that give primary consideration to providing extended learning time...(and) help provide an accelerated, high-quality curriculum, including applied learning; and minimize removing children from the regular classroom during regular school hours for (Title I) instruction...(and) coordinate with and support the regular education program which may include - counseling, mentoring and other pupil services; college and career awareness and preparation...innovative teaching methods which may include applied learning and team teaching strategies; services to prepare students for the transition from school to work...and services to assist preschool children in the transition from early childhood programs to elementary school programs." (Sec. 1115, IASA)
<b>2001</b>	The No Child Left Behind Act is passed into law

Districts must decide which schools will be eligible for receiving funds by one of two choices. Districts may choose to determine as eligible those schools with poverty at or above the district average, or districts may draw the line at or above 35% poverty. Districts are encouraged to concentrate funds in their schools of highest poverty which may result in insufficient funding to serve every eligible building.

Once funded, Title I schools take one of two forms - schoolwide programs (SWP) or targeted assistance program (TAS). Schools with poverty percentages at or above 40% have the option of creating a “schoolwide program.” Any school with a Title I allocation that does not have a comprehensive schoolwide plan on file at the district office is a TAS. Schoolwide programs are required by law to complete one full year of planning, to have received planning assistance from outside the district and to have the plan reviewed by a locally created schoolwide support team prior to implementation. A schoolwide program is created for the purpose of considering all children in the building as eligible for Title I services, and under schoolwide authority, a schoolwide program has the opportunity to combine federal education dollars with state and local funds to upgrade the entire educational program.

By contrast, a TAS has an obligation to identify a specific group of eligible students and must keep clear records separately tracking all sources of funding. In TAS, Title I funds are traditionally used to add supplemental reading and/or math programs serving a select number of identified students. In a TAS, children eligible for Title I are those most at risk of failing to meet Oregon state standards as determined by multiple indicators.

With the new flexibility and lower poverty criteria for schoolwide programs under the No Child Left Behind Act, it’s seldom a question of “Can we become a schoolwide?” It is a school’s decision whether to go through the planning process and become a schoolwide program or remain a targeted assistance program. When attempting to determine the best design for a school, TAS or Schoolwide Program, it is important to carefully examine the building profile. What constitutes the range of socio-economic-status (SES)? Is there a general middle-low to low income level, or are there two or three fairly distinct SES groups? What constitutes the assessment data in core academic areas? Would the entire school benefit from intensive academic program goals or does the average consist of a considerable group of high scores and a sizable group of quite low scores? If the latter is true in both cases, a TAS may be the better choice in that it allows the school to focus on a very specific group of children.

If the school community feels that a schoolwide program is the better model, qualifying at 40% may be accomplished by reaching 40% poverty at any point during the planning year or upon implementation. The district may allow schools to use different poverty criteria than that used to place the school in rank order to determine Title I eligibility. As an example, if the district places its schools in rank order using Aid to Families with Dependent Children (AFDC), the district could allow its schools to use free and reduced lunch rates to determine schoolwide eligibility because free and reduced lunch participants are generally larger in number than those from families receiving AFDC. A school that has failed to meet the 40% criteria at some point in the planning year may implement a schoolwide plan only after it petitions and receives an Education Flexibility Waiver from the Oregon Department of Education.

Schoolwide	Targeted Assistance
<p>A school is eligible for a schoolwide program if at least 40 percent of its enrollees or resident children are from low-income families.</p> <p><b>Note:</b> An eligible school is not required to operate a schoolwide project.</p>	<p>A school is eligible for a targeted assistance program if it is in a Title I eligible school attendance area.<sup>1</sup></p>
<p>In order to implement a schoolwide program, an eligible school must first develop a comprehensive plan (<i>developed in consultation with the LEA and school support team, and with the involvement of the community to be served and the individuals who will carry out the plan</i>) for reforming the total instructional program in the school.<sup>2</sup></p> <p>The law requires a one-year planning period for new Schoolwide Programs.</p>	<p>The LEA plan includes a general description of targeted assistance school activities.</p>
<p>An LEA uses Title I funds in a schoolwide program school to upgrade the entire educational program of the school. All students are eligible to participate in all aspects of the program as appropriate. A school must still know who are the students most at risk of not reaching standards and address these targeted groups of students to address their needs.</p>	<p>An LEA uses Title I funds in a targeted assistance program school to support programs for <b>eligible</b> children. However, the law does not prohibit a school from serving students who are served with Title I funds <i>simultaneously</i> with students with similar educational needs, in the same educational settings, where appropriate.</p>
<p>In a schoolwide program school, Title I funds may be commingled with other federal, state, and local funds to upgrade the entire educational program at the school.</p>	<p>Coordination with other programs is expected. Commingling of funds is not allowed.</p>
<p>A schoolwide program may use Title I funds to meet the needs identified through the school's comprehensive needs assessment (<i>including comprehensive services</i>).</p>	<p>In general, Title I funds are to be used to provide educational services to the school's eligible children. However, in some circumstances, Title I funds may be used to provide comprehensive (<i>non-educational services</i>) for eligible children.<sup>3</sup></p>

<sup>1</sup> With a few exceptions, "eligible school attendance area" refers to a school attendance area or a school in which the percentage of low-income children is at least as high as the percentage of low-income children in the district as a whole (See -NCLB Section 1113).

<sup>2</sup> The comprehensive plan describes the components of the schoolwide program; describes how Title I and other resources will support these components; lists other programs that will be included in the schoolwide; describes how the school will provide individual students assessment results to parents; provides for the collection of data and assessment results of students which can be disaggregated by gender, major ethnic or racial groups, limited English proficiency status, migrant status, students with disabilities as compared to other students, and economically disadvantaged students as compared to students who are not economically disadvantaged; seeks to provide statistically sound results for each disaggregated category; and provides for the public reporting of data only when the reporting is statistically sound.

<sup>3</sup> The law states that if health, nutrition, and other social services are not otherwise available to eligible children in a targeted assistance school, and the school, if appropriate, has engaged in a comprehensive needs assessment and established a collaborative partnership with local services providers, and if funds are not reasonably available from other public or private sources, then the school may, as a last resort,

Schoolwide	Targeted Assistance
<p>A schoolwide program school may use Title I funds only to supplement the amount of funds that would otherwise be available from non-federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.</p>	<p>A targeted assistance school may not use Title I funds to provide services that are required by law for children with disabilities and children with limited English proficiency, but it may use Title I funds to supplement or coordinate these services.</p>
<p>Schoolwide programs are not required to identify particular children as eligible to participate in services or to provide supplemental services to such children (i.e., a schoolwide program may use Title I funds to serve any and all children in the school).</p> <p>Since all children in a schoolwide program may be served with Title I funds, it is not necessary to track which staff work with which student).</p> <p>Time and effort reports are not required.</p>	<p>Targeted assistance schools use Title I funds to provide services to eligible children.</p> <p>Eligible children refers to children and youth :</p> <ul style="list-style-type: none"> <li>⇒ who are under age 21 and entitled to a free public education through grade 12, and younger children who are of an age at which children can benefit from an organized educational program; <b>AND</b></li> <li>⇒ who are <b>failing or most at-risk of failing</b> to meet the state's challenging student performance standards.<sup>4</sup></li> </ul> <p>School personnel who are paid with Title I funds may:</p> <ul style="list-style-type: none"> <li>⇒ assume limited duties that are assigned to similar personnel who are not paid with Title I funds, including non-instructional duties, as long as the amount of time spent on these duties is the same proportion of total work time as prevails with respect to similar personnel at the same school;</li> <li>⇒ participate in general professional development and school planning activities; and</li> <li>⇒ collaboratively teach with regular classroom teachers, if such collaborative teaching directly benefits participating children.</li> </ul>
<p>A schoolwide program school helps all children</p>	<p>A targeted assistance school assists participating</p>

use Title I funds to provide these types of services. This may include providing basic medical equipment (such as eyeglasses and hearing aids), compensating a coordinator, and providing professional development to help staff identify and meet the comprehensive needs of eligible children.

<sup>4</sup> Children who are failing or most at-risk of failing are to be identified based on multiple, educationally related, objective criteria, except that children from preschool to grade 2 are to be selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures. In addition, the law states that children who are economically disadvantaged, children with disabilities, migrant children, and limited English proficient children are eligible for the targeted assistance school program on the same basis as other children. Children who participated in Head Start or Even Start during the previous two years are also eligible for services, and homeless and N or D children may be eligible.

<p>meet the state's challenging standards.</p> <p>Schoolwide program schools have a great deal of flexibility in coordinating resources. For example, in addition to the provisions stated in boxes above, the law states that the Secretary may exempt schoolwide programs from the statutory or other regulatory provisions of any other formula or discretionary grant program administered by the Secretary—except programs under the Individuals with Disabilities Education Act (IDEA)—to support schoolwide programs if the intent and purposes of these programs are met.<sup>5</sup></p> <p>A schoolwide program must review its progress on an ongoing basis. Although the schoolwide program plan is in effect for the duration of the school's participation in Title I through this authorization, the school must review and revise this plan as necessary to help all children meet the state's standards.</p>	<p>children in meeting the state's proficient and advanced levels of performance by:</p> <ul style="list-style-type: none"> <li>⇒ coordinating Title I resources with other resources; and</li> <li>⇒ reviewing, on an ongoing basis, the progress of participating children, and revising the targeted assistance program as necessary to help participating children meet the state's standards (<i>e.g., by offering extended day and year programs, and by training teachers to identify students needing assistance and to implement student performance standards in the classroom</i>).</li> </ul>
<p>Schoolwide programs are subject to school improvement provisions (§1117).</p>	<p>Targeted assistance school programs are subject to school improvement provisions (§1117).</p>
<p>Schoolwide programs must comply with Title I requirements for parent involvement (§1118).</p>	<p>Targeted assistance school programs must comply with Title I requirements for parent involvement (§1118)</p>
<p>Schoolwide programs must comply with Title I requirements for professional development (§1119). All educational assistants who assist in core academic instruction must be highly qualified.</p>	<p>Targeted assistance school programs must comply with Title I requirements for professional development (§1119). Educational assistants who work in the Title I targeted program must be highly qualified.</p>

<sup>5</sup> A school that chooses to use funds from other programs shall not be relieved of requirements relating to health, safety, civil rights, gender equity, student and parental participation and involvement, services to private school children, maintenance of effort, comparability of services, uses of federal funds to supplement non-federal funds, or the distribution of funds to SEA or LEAs.

Schoolwide	Targeted Assistance
<p>A schoolwide program must include the following components:</p> <ul style="list-style-type: none"> <li>• A comprehensive needs assessment of the entire school based on information on the performance of children in relation to the state content and performance standards.</li> <li>• Schoolwide reform strategies that provide opportunities for all children to meet the advanced and proficient levels of student performance, use effective instructional strategies, address the needs of all children in the school, and are consistent with the state's Continuous Improvement Plan and LEA's school improvement plan. A schoolwide should have its schoolwide plan be its school improvement plan. There is only one plan.</li> <li>• Instruction by highly qualified professional staff.</li> <li>• Professional development for teachers and educational assistants (and, where appropriate, pupil services personnel, parents, principals, and other staff).</li> <li>• Strategies to increase parental involvement, such as family literacy services.</li> <li>• Plans for assisting preschool children in the transition from early childhood programs to local elementary programs.</li> <li>• Measures to include teachers in making decisions about assessments. Activities to identify, and ensure timely assistance to, students who experience difficulties.</li> <li>• A description of how the school will use resources under Title I and other sources to implement the above components.</li> <li>• A listing of other state and federal programs that will be included in the schoolwide program.</li> </ul>	<p>Each targeted assistance program must:</p> <ul style="list-style-type: none"> <li>⇒ Use Title I resources to help participating children meet the state's student performance standards expected for all children.</li> <li>⇒ Be based on scientifically research based strategies for improving achievement of children.</li> <li>⇒ Ensure that planning for students in the targeted assistance program is incorporated into existing school planning.</li> <li>⇒ Use effective instructional strategies that give primary consideration to extended learning time; help provide an accelerated, high-quality curriculum; and minimize use of the pull-out model.</li> <li>⇒ Coordinate with and support the regular educational program.</li> <li>⇒ Provide instruction by highly qualified staff.</li> <li>⇒ Provide opportunities for professional development for administrators and for teachers and other school staff who work with children in the targeted assistance program (supported with Title I funds and other sources).</li> <li>⇒ Plans for assisting preschool children in the transition from early childhood programs to local elementary programs.</li> <li>⇒ Provide strategies to increase parental involvement, including family literacy services.</li> </ul>



## Models of Service Delivery

Title I programs have been successful in using a variety of models. The model is less important than the quality of instruction, the coordination with the regular program and positive connection with parents of children served. Successful models include the following practices:

- Using a common curriculum aligned with the Oregon standards
- Maintaining good communication with the regular classroom teacher or other content area teachers;
- Adapting instruction to student learning styles and needs;
- Involving parents; and
- Providing timely instructional alternatives when students are unsuccessful.

### Models

Pullout	Students are taken out of their regular classroom for one or more class periods for separate instruction.
In-Class	Additional instruction/support is provided in the regular classroom by Title I funded staff. Types of in-class service delivery vary.
Schoolwide	An option in high poverty (40% or greater) schools ONLY. All students are served by Title I through comprehensive school restructuring.
Extended Schedule	Instruction outside the regular school schedule; includes before/after school programs; year round instruction, extended day and/or summer school.
Replacement	Sometimes referred to as extended pullout, instruction by Title I teacher replaces more than 25% of the instruction in the regular classroom. This model is more often used in secondary programs and must be “matched” with additional regular education dollars.
Early Childhood Options	Programs designed for children birth to age five include Title I collaborations with Even Start Family Literacy, Head Start/Oregon Pre-kindergarten, Title I funded Preschools and may include other family services.
Computer-Assisted Learning	Students use computers for presentation of new material, information retrieval, drills, problem solving and for education games within the regular classroom or school setting.

### Types of In-Class Service Delivery

<b>Divide and Instruct</b>	Classroom teacher provides initial instruction. Title I teacher gives Title I students <b>additional</b> small group instruction on the same topic. Other students may participate with the Title I students simultaneously
<b>Flooding</b>	Classroom teacher and Title staff each have a small group of students and provide more intense instruction to meet the needs of each small group. In TAS Title funded staff need to work with Title I eligible students (a few other students may participate simultaneously if it does not weaken the program for the Title I eligible students.
<b>Centers</b>	Students rotate to different instructional areas, one of which is set up by the Title I teacher specifically designed to meet the needs of Title I/at-risk students, or Title I staff rotate with Title I students through Center activities created by classroom teacher and provide additional support during the activities.
<b>Title I staff as Floater</b>	Title I staff circulate around class and provides assistance, extended instruction, additional resource materials to Title I students as needed. Other students may benefit from this support so long as eligible students are not denied service by the Title I staff working with non-Title I students.
<b>One-on-one instruction/tutoring</b>	Title I staff work with one student at a time on specific concepts.
<b>Co-teaching</b>	Classroom and Title I teachers work cooperatively to plan and present instruction using more than one instructional mode.
<b>Switching roles</b>	Classroom teacher provides additional instruction for Title I students while the Title I teacher works with the rest of the class.

### Principles for Developing Service Delivery Models

- Service delivery model is based on the school’s needs assessment
- Designed at the building level
- Based on the needs of the identified students
- Consider non-traditional alternatives (besides pullout)
- Strive for the ideal; modify according to local resources
- Expect a school to need more than one model

**EXAMPLE OF A PLAN FOR TITLE I SERVICE DELIVERY MODELS**

TITLE I SERVICES		WHEN will services be provided?	WHERE will services be provided?	WHO will provide services?
Grade Level	Subject Area			
Pre-K Preventive	Cognitive, Social, Physical, Emotional	Half-day	Head Start Center	TI Early Childhood Teacher
1st Grade: Preventive Supportive  Intensive	Reading  Reading  Reading	First half of reading time During class time  Before/after school	Resource room  Regular classroom  classroom	TI teacher  Instructional Assistant Reading Recovery Teacher
5th Grade: Preventive  Intensive	Math  Math	3 days/week  30 min., 5 days/week	Regular classroom  Regular classroom/TI students only	Computer para-professional Team: TI teacher, Regular classroom teacher, instructional assistant

**Considerations in Planning for In-class Service**

In implementing in-class services for your Title I students careful planning can help to ensure success. Classroom teachers, Title I staff, and the building principal should work together in planning for implementation. The following considerations may be useful in your planning.

Curriculum and Instruction: A key factor in successfully implementing improved coordination and in-class services is that the change be viewed as better by all involved: the classroom teacher, the Title I staff; and the students. A good starting point is closely examining both the written and taught curriculum and the instructional approaches that are used to implement this curriculum. Where can teamwork help in better meeting curricular and instructional goals and better meeting the needs of Title I students so that they will meet the standards?

What areas of the curriculum will be emphasized during in-class instruction to assist Title I students to succeed in the classroom?

What specific instructional activities and strategies should be targeted for in-class services? Should the focus be on Guided Reading, Writer’s Workshop, Language Development, Math Problem solving?

Reading Considerations: Before Reading Activities--helping students develop/activate prior knowledge, set purposes for reading, and initiate predicting strategies.

During Reading Activities--keeping students actively involved in their reading through strategies such as KWL, semantic mapping, and interactive discussion.

After Reading Activities-- allowing students to respond in a variety of ways so comprehension is treated as constructing meaning. Activities could be written, oral, or multimedia formats and should be varied to encourage flexible and independent strategies.

### **Options for Starting In-Class Services**

The following descriptions may be helpful in getting started with in-class services. They are suggestions for your consideration, not prescriptions, and can be altered and/or used in combination.

- **Single Classroom Pilot**  
Title I staff goes in-class into a single classroom with a teacher who is willing to work together in the pilot. It is important to use this as a pilot and learn from it. Try different materials, instructional approaches (reinforcement and readiness), student grouping patterns, etc. Try different methods of communication - planned meetings, regular exchange of written information, one-minute updates, etc. Assess information exchanges to see what is most valuable in providing coordinated instruction for Title I students. Use pilot experience to expand in-class services to other classrooms.
- **In-Class/Pullout Combination**  
Title I staff goes in-class several days a week and provides pullout services the other days. In planning it may have been determined that some services are best provided in-class and others in the pullout setting. Some instructional strategies may require more room or be disruptive to the regular classroom. Combination services may also be necessary in programs that have a lab or computer component which requires materials and/or equipment not available in the regular classroom.

### **Extended Learning Time**

NCLB, Title I Part A Section 1114, Schoolwide Programs, and Section 1115, Targeted Assistance Schools encourages increasing the amount and quality of learning time by providing an extended school year, before and after school opportunities, and summer school programs. The law states that these extensions of time should provide **enriched** and **accelerated** curriculum. Section 1115 (TAS) ties this extended time provision with a requirement to “minimize removing children from the regular classroom during regular school hours” for Title I instruction.

A number of Oregon schools with modified or year-round calendars have begun using Title I funds to provide inter-sessions or instructional opportunities during the extended winter, spring and summer breaks. Other schools are creatively scheduling the Title I staff to provide extended day and year opportunities. For example, a Title I funded teacher may provide a six week, four day summer session, then work a four day work week during a major portion of the regular school year to total the same number of contract days as other teachers in the district. Another example is to provide a flexible daily schedule for Title I funded staff in order to provide before and/or after school learning opportunities and parent programs.

There are few limits to the creativity and flexibility allowed under the law for creating extensions of learning time with Title I funds. The only restrictions within NCLB have to do with extended time activities. These programs are not intended to be used for remedial or basic skill drill and practice.

### **Needs Assessment and Profiling**

It is the responsibility of each Title I funded school to conduct its own annual needs assessment. At the building level, this may be referred to as creating a building profile. The Title I purpose for this activity is to determine grade levels and subject areas where the greatest needs for supplemental instruction and/or student support exist.

However, if the data from the profile is not **used** as a basis for decision making about school programs and learning opportunities, the value of the needs assessment process is extremely limited. The profile is a tool for building sound needed programs. The data contained in this report may be used for a variety of purposes and for Title I purposes must be updated annually.

*Example: An elementary school might determine that the best use of its Title I money is to collaborate with the local Oregon Pre-kindergarten to provide family literacy instruction to adults who need basic literacy skills and/or a high school diploma and to follow-up with a full day kindergarten experience for these participating children. In so doing, the school has determined that eligible Title I students (those at greatest risk of failing to meet high standards) are those preschool youngsters living within the school attendance area whose parents lack basic literacy skills or a high school education. The school reached this determination through its comprehensive profile which indicates there is lower attendance among primary age poor children than among their higher SES peers. Reading skills have increased for third and fifth grade but at a rate less than the rise of mathematics over the last three years. Staff reports that children entering kindergarten have higher rates of at-risk behavior than was typical three years earlier and that the half day kindergarten experience does not appear to fully prepare all students for first grade learning tasks. By third grade, there is an alarmingly high correlation between the numbers of students below proficiency in all the core academic areas and the students from families of poverty. By fifth grade, the number of discipline referrals among the academically at-risk, low SES population is three times that of their higher SES peers. In profiling, the school investigated the numbers of prior students who, after entering the middle and/or high school into which this elementary school feeds, had dropped out. This investigation caused the school to determine that over a five-year period, 80% of its former students who had dropped out of middle or high school were from families of poverty and over half of those included children whose parents lacked a high school diploma or GED. The school community surveys indicate that parent is desired, although not particularly supported through practice. For the last three year, the majority of staff development has focused on student performance assessment in mathematics at third through fifth grade levels. Although other needs exist, the school determined that the greatest priority was to intervene at the earliest opportunities with children from families who had similar situations to those previously determined at greatest risk by having dropped out of school.*

At a minimum, the school profile should include these five key dimensions: School Context and Organization, Curriculum and Instruction, Family and Community Involvement, Student Achievement and Professional Development. Refer to the Title I Schoolwide Planning

Handbook for the Section on Conducting a Comprehensive Needs Assessment. This process can be used for a TAS or Schoolwide program.  
[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_i/fiscal/swphandbook03\\_04.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_i/fiscal/swphandbook03_04.doc)

A straightforward six-step process will help create a school profile. The six steps are:

- Choose the types of information to collect for each dimension;
- Identify data collection procedures;
- Select data collection instruments;
- Collect the data;
- Tabulate and summarize; and
- Analyze the results.

The team may find helpful the list of questions that have been designed to help assess the school's current status on each of the five dimensions. [Needs Assessment Data Collection Questions](#). For example, under the dimension "Professional Development" the planning team might ask questions about professional development such as, "Are professional development activities consistent with district and school goals?" or "To what extent do teachers implement the changes suggested during trainings?" These types of questions will help the planning team frame the data collection effort

## **Targeted Assistance Programs**

### **General Information**

A comprehensive description of Targeted Assistance Schools (TAS) is provided within the USDE Policy/Guidance document “Targeted Assistance Schools.”

[http://www.ed.gov/legislation/ESEA/Title\\_I/target.html](http://www.ed.gov/legislation/ESEA/Title_I/target.html)

### **Targeted Assistance School**

A targeted assistance school is one that receives Title I-A funds, yet is ineligible or has chosen not to operate a Title I Schoolwide Program. A targeted assistance school provides services to a select group of children - those the school identifies, on the basis of multiple educationally related objective criteria, as failing or most at risk of failing to meet the State’s challenging content and performance standards. Targeted assistance schools may not provide services for all students in the school, or for all students in a particular grade.

Targeted Assistance Title I programs differ from Schoolwide Programs in the following ways:

- TAS does not require a comprehensive schoolwide program needs assessment
- A targeted list of students with clear entrance and exit criteria must be maintained.
- In TAS, Title I-A funds may be used only for programs that provide services to eligible children (failing or at risk of failing of meeting standards);
- Funds must be used for services that supplement--not supplant—services that would be provided by nonfederal sources, in the absence of Title I-A funds.
- Records must be maintained documenting the expenditure of Title I-A funds solely on services for eligible students.

In TAS, Title I funds are traditionally used to add supplemental reading and/or math programs serving a select number of identified students.

### **A targeted assistance program must accomplish the following objectives:**

- Use all Title I-A funds to promote academic achievement standards in eligible students;
- Incorporate Title I-A planning into the School Improvement Plan
- Be based on effective means for improving achievement of participating children;
- Use scientifically-based instructional strategies to strengthen core academics;
- Give primary consideration to extended-time strategies, such as an extended school year, before- and after-school, and summer programs and opportunities;
- Provide accelerated, high quality curricula;
- Minimize pull-out programs;
- Coordinate and support the regular education program;
- Provide instruction by highly-qualified and trained professional staff; and
- Implement strategies to increase parental involvement.

Title I program decisions may be made at the school level, when schools act in consultation with their districts, to determine the uses of funds that best meet the needs of their students.

### **Eligible Student Selection**

Selecting the highest needs children for the Title I program is an integral part of targeted assistance program. Selection for the Title I program is conducted at both the school and the

district levels, and differs for children by grade level. Eligible children are identified as those failing or being at risk of failing to meet academic achievement standards.

- Children from preschool through 2<sup>nd</sup> grade must be selected solely on the basis of teacher judgment, interviews with parents, and results of developmentally appropriate measures.
- To determine eligibility of students in grades 3-12, the eligibility must be based on multiple, educationally related objective criteria established by the LEA and supplemented by the school. Parent request and teacher judgment *may* be used to place children in grades 3-12 in Title I programming *in conjunction with, but not in place of*, standardized achievement measures.

With the authorization of NCLB the categories of children who are automatically eligible for Title I programs has expanded to include:

students served in the previous two years under the Migrant Education Program.

Also automatically eligible is:

- Any child who participated in Even Start, Head Start, Early Reading First or a Title I preschool service within the previous two years,
- Any child attending a community day program or living in a state or local institution for neglected or delinquent children; and
- Any child who is homeless and attending any school in the LEA (not necessarily a Title I funded school)

Teacher assessment and referral inform the selection process. This information is important in determining each student's success in the classroom. Examples of teacher assessments are ratings of subject area skills and relative student performance within the regular classroom. In the example below the district created Reading Rubric is one of the educationally related objective criteria as well as a teacher survey that scores each student from 0 (low skills) to 10 (high skills) on the subject skills such as reading or math, performance of those skills and classroom performance.

After the scores have been collected and summarized a targeted list is developed (Illustration II) that places students in order of need based on the criteria. Using a spreadsheet to do this task can be very helpful and time effective.

*Illustration I*

Objective Criteria Score		Teacher Assessment	
District Reading Rubric Score	Points	Subject area skills	= 0-10
6-5	0	Subject area performance	= 0-10
4	10	Classroom participation	= 0-10
3	20	highest score = low skills performance	
2	25		
1	30		

<b>Student Selection:</b>	<b>60 = highest priority</b>	<b>0 = lowest priority</b>
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**Sample of a Selection form**

Illustration II

Grade	Student	Rubric score	+ Points from Rubric	+ Teacher Assmt. points	= Total Points	Rank Order	Notes
4	Jenny	4	10	30	40	6th	Title I Eligible
7	Carlos	1	30	32	62	1st	Title I Eligible
3	Latisha	3	20	32	52	4th	Title I Eligible
5	David	6	0	2	2	9th	below cut-off
6	Leah	1	30	30	60	2nd	Title I Eligible
4	Renee	3	20	5	25	7th	below cut-off
3	Jason	2	25	21	46	5th	Title I Eligible
5	Clark	5	0	5	5	8th	below cut-off
4	Maria	2	25	28	52	3rd	Title I Eligible

The student selection process will result in a rank ordering of students for each subject area. Students must be selected in rank order from the list. The basic guidelines for selecting students are as follows:

- Students in greatest need are to be served in rank order;
- Selection is based on multiple, educationally related, objective criteria established by the local educational agency and supplemented by the school;
- *Except* for grades K-2, teacher referral *can never* be the primary factor for placing a student into the Title I program.

**Administrative considerations:**

- Should a school decide to serve a low-priority student ahead of a high priority student, the reason must be clearly documented and determined on a case-by-case basis.
- Acceptable reasons for non-placement of high priority students include: a) parent refusal of placement and b) if a student's needs are addressed through other services.
- Students may not be removed from the list just because they receive another educational services such English Language services or specially designed instruction through an IEP. Based on a student by student case it may be determined that the other service a student is receiving is sufficient to enable them to meet the State's standards. This must be documented on the target list why a higher needs student has been "skipped over" for services.

**Serving Limited English Proficient Students and Students with Disabilities**

Children with disabilities and Limited English Proficient children are eligible for Title I-A services on the same basis as other children who are selected for services. However, they are also entitled to services required by law because of their disability or their limited proficiency in English. To avoid supplanting, a targeted assistance school may not use Title I-A funds to provide the level of services necessary to meet the Federal, State or local law requirements for limited English proficient children or children with disabilities. Title I-A funds may be used to

coordinate and supplement these services as well as to provide additional direct services to these children.

**Note:** There is no prohibition from providing Title I services in the same subject area in which a child is receiving special education services or services to address limited English proficiency. For example, a special education student being provided with special education services in reading sufficient to meet his IEP requirement may also be provided Title IA services in reading if the school identifies the student as being in greatest need of assistance for meeting the State's content and performance standards. The Title I-A service can not be part of the IEP requirements.

For examples of Title I-A funded services for LEP Students and for Students with Disabilities see the Policy Guidance for Title I, Part A – April 1996 Targeted Assistance Schools [http://www.ed.gov/legislation/ESEA/Title\\_I/target.html](http://www.ed.gov/legislation/ESEA/Title_I/target.html)

### **Exit Criteria and Procedures**

In addition to determining which students will be served by Title I, targeted assistance schools must set criteria by which students may receive an academic exit from the program. This exit process depends on the selection criteria and individual student performance. In order to provide equal access to all children, it is important for each school to have clearly delineated the processes and criteria that will be used to move children in and out of Title I programs.

Academic exit actually refers to the child that is no longer considered eligible for Title I program services. When a child reaches grade level, or meets the Title I program criteria for an academic exit, even if he or she continues to receive services until the end of the grade being served, that child is noted as an academic exit. Moving into a grade that does not have Title I services from a grade that did is not considered an academic exit. For example a program designed around early reading and/or math success tend to provide services to children at specific grades; once the child has moved out of the grades where services are offered, services end. This type of program exit is not referred to as an academic exit.

At what point in a student's academic gain or performance should he or she no longer be served by Title I? The capacity of the Title I program (the number of eligible students that could be served compared to the staffing and programs for them) is a large consideration. Elementary programs tend to differ from secondary programs. Ideally, all eligible student receive supplemental Title I services until they are no longer at risk of failing to meet the state's standards. The reality is, however, that many Title I programs have waiting lists of eligible students who may have greater need than students who have been in Title I, made progress, but are still not meeting standards.

Typically, schools that provide services to the highest needs children throughout the grades tend to keep students enrolled in Title I year after year. In some cases even though a student may be progressing appropriately in the classroom, the Title I program continues to serve him or her just to provide that bit of extra support. When there is no waiting list of eligible, higher needs students, this may be acceptable but when other students are waiting to participate this would not be an advisable practice. Title I students may be given an academic exit, still have their progress monitored and even receive supplemental services as needed through the simultaneous service clause in Title I.

## Selecting a Service Delivery Model

There are several models available for Targeted Assistance Schools. The TAS, in consultation with the district Title IA Coordinator, selects the most appropriate service model. Pull-out models are highly discouraged, while models that include before/after school programming, extended year education and summer opportunities are encouraged.

Samples of models are reviewed in the early section of Chapter 7 under Service Deliver Models. When a delivery model has been selected, it must be demonstrated that students receiving Title I-A services benefit from the additional instruction and support.

## Simultaneous Service

Schools are encouraged to provide Title I services to students in a variety of ways. Schools may serve Title I-A students simultaneously with a) students with similar educational needs b) in the same educational settings as students with similar needs.

## Parent Involvement

Parental involvement is required by Title I-A. All parents must be notified that their child is receiving Title I-A services, and these services must be explained. A refusal notice is included in this notice. While parents do not have to give permission for their child to receive services, most sites ask that parents sign and return a refusal notice should they wish their child *not* to receive services. Parents do not need to sign a form and send it back to the school before Title I services are provided.

Parents of students receiving Title I-A are required to have an opportunity to participate in an annual parent meeting and parent-teacher conference. Parent Involvement is an important component of a targeted assistance or schoolwide program. Refer to the Parent Involvement Chapter in this handbook for all requirements.

*Additional information and tools regarding school-home compact and parental involvement may be found at <http://www.projectappleseed.org/titlei.html> and Parent Involvement Non-Regulatory Guidance, April 2004 <http://www.ed.gov/programs/titleiparta/parentinvguid.doc>*

## Comprehensive Services

Districts and schools may utilize Title I monies to provide additional services beyond academics if these services are not otherwise available. Sites must have identified partnerships with social service and community agencies and be able to demonstrate that such services are unavailable through other agencies. In addition, they must complete a comprehensive needs assessment prior to redistribution of Title I-A funds.

Comprehensive services that may be funded by Title I-A funds, *which meet the above criteria*, include by are not limited to:

- Basic medial equipment (such as eye glasses and hearing aids) to children receiving Title I services;
- Teacher professional development to assist school staff and parents in meeting the needs of Title I children;
- Compensation of a Title I-A Coordinator

## Administrative Duties

As with any federal funding, it is critical that all records be kept, be well-maintained, and up-to-date. The following record-keeping duties must be met to ensure adherence to federal guidelines.

- Records must be maintained that document that Title I-A funds are spent on activities and services only for participating Title I-A students. For example:
  - Title I-A services may not be included on an IEP, but a student with an IEP may be eligible for Title I-A services.
  - Title I-A funds may *supplement* programming for a student with limited English proficiency, but *may not be used to fully fund* such programming. Title I-A funds may also supplement reading or math for students with limited English proficiency who are failing or at risk of failing in these content areas.
- Title IA funds may not be used to identify at risk students. It is the responsibility of the LEA and school to identify at risk students. A school or district should have some methods in place to do this even in non-Title schools. Once the at-risk students are identified Title IA funds may be used to identify those most in need of the Title IA services or to identify their specific educational needs or weaknesses.

District Title I-A Coordinators must keep records of TAS on file at the district office.

These include:

- Selection criteria and selection process for Title I-A eligible children;
- Documentation of parent meetings;
- Copies of the Home-School Compact;
- Service-delivery model description for each TAS;
- Time and effort records of every Title I-A funded teacher, paraprofessional, administrator and counselor;
- Program evaluations;
- Program review results.

Schools must keep records of:

- Selection criteria and selection process for Title I-A eligible children;
- Selection worksheets demonstrating how students were selected for service;
- Description of service delivery models;
- Documentation of parent meetings and conferences;
- Evaluations of each service delivery model (including extended day/year models)
- Comprehensive services provided to eligible students
- Student-related data to include:
  - Student name, race/ethnicity, disability and/or LEP status;
  - Oregon Standardized Assessment or other standardized test score(s);
  - Date of entrance into program;
  - Services provided;
  - Progress made;
  - Parent contacts (recommended by not required);
  - Date and reason for exiting the program.

**NOTE:** *ALL* district, school and student records should be retained **for 3 years**. The records are confidential legal documents and must be available to local and USDOE federal auditors, parents, students and ODE monitors.

## **Schoolwide Programs**

### **General Information**

The Title I program has traditionally provided services to educationally disadvantaged students using a few delivery models (e.g., pull-out, in-class) that target individual students for services and supplement the regular school program. The results of these programs, however, have been mixed; many Title I students will not meet challenging State content and student performance standards.

One explanation for the results is due to the effects of high concentrations of poverty in many Title I schools. Where poverty is concentrated, the poverty level of the school itself can impede all students' performance. Research shows that traditional Title I programs often do not overcome the pervasive effect of poverty because most programs add little extra learning time and do not improve the quality of teaching and learning in the regular classroom where Title I children spend most of their school day. Without improved instruction in the regular classroom program, Title I students will achieve only moderate success.

A schoolwide program is based on the belief that students, especially those in high-poverty areas, will benefit the most from schooling when schools are given the opportunity to improve the entire instructional program. The schoolwide option allows schools to focus on the entire school rather than on an individual program that operates in the school for a small portion of the school day. It also enables schools to combine Title I funds with other federal, state, and local programs to upgrade a school's entire program.

A schoolwide program cannot and should be not the same pull-out Title I program that the school operated; it is not more of the same. It is a vehicle for school reform and should help schools develop a new vision for school improvement. A schoolwide program is built on schoolwide reform strategies, rather than separate, add-on services. Research on schoolwide programs shows many different ways to implement the schoolwide concept, and each school must design its own program that best meets schoolwide needs.

### **Advantages**

The No Child Left Behind Act of 2001 (NCLB), the current reauthorization of the Elementary and Secondary Education Act of 1965 (ESEA), continues to encourage high-poverty schools to implement Title I schoolwide programs. Notably, the NCLB lowers the percent-in-poverty requirements for schoolwide programs and increases school-level flexibility.

The schoolwide program provisions provide many advantages to schools developing schoolwide programs. By allowing schools to integrate their programs, strategies, and resources, the schoolwide program authority can become the catalyst for comprehensive reform of the entire instructional program children in these schools receive.

An example can show why:

Imagine a schoolwide program funded under Title I, Part A, that also receives professional development funds under Title IIA, English Language Proficiency education funds under Title III, and Vocational Education money under the Perkins Act. This schoolwide program school would not have to document that it spent professional

development funds on professional development activities or Perkins money on vocational education programs. Nor does the school have to demonstrate that it is complying with all of the separate requirements of each of these programs. As long as the school meets the intent and purposes of these programs and demonstrates that its schoolwide program plan contains sufficient activities to reasonably address the needs of the intended beneficiaries of those programs that were identified through the comprehensive needs assessment, it could combine those funds with its other funds to support overall schoolwide initiatives for all students. Ultimately, the evaluation of the schoolwide program's effectiveness will demonstrate whether the intended beneficiaries' needs are being met by the many programs' resources.

By consolidating their Federal resources to support schoolwide reform, the principal, teachers and other school staff within a school, **with the participation of parents**, have the opportunity to:

- Comprehensively plan the overall educational program for all children in the school.
- Come together with one another, eliminating the isolation that characterizes working conditions for many educators.
- Address the needs of students in an integrated way.
- Spend Federal resources in ways they determine can most effectively raise the achievement of their students.
- Stimulate comprehensive reform of the entire instructional program provided to children, rather than operating separate and fragmented add-on programs.

Schoolwide programs encourage schools to begin planning by asking themselves: How are the students performing in relation to what children are expected to know and do? What kind of schoolwide changes are necessary to support achievement of the State standards? Is the program designed to address the needs of all children who attend the school over the entire year? As long as they are asking--and answering--these kinds of questions, schoolwide programs can use their Federal resources to support the kinds of changes they deem essential for the success of their students.

The schoolwide option encourages high-poverty schools to integrate programs, strategies, and resources to support high quality education for all students. The law specifically allows schoolwide programs to:

- use Title I funds to upgrade the school's entire educational program;
- use Title I funds to serve any and all students at the school; and
- commingle Title I funds with other federal, state, and local resources to upgrade the entire school program and to help all students meet the state's challenging standards.

These provisions can help:

- eliminate the stigma of the "disadvantaged" label;
- coordinate budgets from multiple sources;
- remove the sense of separation between Title I and other school staff; and
- release educators from restrictive mandates covering student grouping, minutes of instruction, detailed curriculum sequences, specific work rules, and other administrative procedures.

By enabling a school to integrate regular and categorical programs into a coherent program for students, a schoolwide program becomes the school's overall educational program—it is not a supplemental effort. This is a key difference between a schoolwide and a targeted assistance program (the traditional Title I program model). In contrast to a schoolwide, a targeted assistance program can only use its Title I funds to serve children who are identified as failing, or most at-risk of failing, to meet the state's standards (i.e., Title I-funded staff work with and design instruction for Title I-eligible children).

To encourage thorough planning and promote meaningful change under the schoolwide option, NCLB continues to require a year-long planning period—involving the entire school community. Many teachers and parents will appreciate this opportunity to plan and the chance to provide meaningful input about the new school program. However, some educators may find it challenging to commit to this front-end effort, especially without any guarantee that it will lead to a more effective program. For those who are skeptical about planning and implementing a schoolwide program, it may help to consider the schoolwide planning process as an excellent opportunity to be closely linked with other school reform efforts (such as Comprehensive School Reform or Continuous Improvement Planning). At a minimum, planning and implementing a schoolwide program will complement and support these existing reform efforts. Because of this, planning a schoolwide program does not present an additional burden. It must be one and the same with the school's overall school improvement planning process. A schoolwide program may also act as a catalyst for school reform by:

- encouraging innovation and new ideas;
- promoting collaboration and planning among regular classroom teachers, administrators, specialists, and support staff;
- involving parents more centrally in planning, decision making, and instructional support roles;
- accelerating curriculum so that it moves all students toward high standards;
- establishing a supportive learning environment for all students;
- creating options for increased learning time through extended day and year programs;
- consolidating and tailoring professional development to meet the school's needs;
- empowering school staff through increased site-based decision making; and
- helping the school to integrate and streamline comprehensive services.

### **Key Features**

The structure and content of schoolwide programs vary according to district and community needs. Many programs are designed along "effective schools" correlates, others base their programs on approaches used by teachers of gifted or talented students emphasizing ambitious standards, and still others which serve bilingual populations may use bilingual educators. Although programs vary, research has identified eight features common to successful programs. Schoolwide planning teams may want to review and discuss the eight key features prior to and while developing their schoolwide program to determine whether these eight key features are included in the schoolwide design.

#### **Shared Vision**

Schoolwide programs are driven by a shared vision for all students. The vision is written and communicated regularly to the school community. Depending on the community, a school plans to accomplish its vision for all students in various ways. Some schools emphasize collaboration and team building among faculty and with the community; others organize their program around new curricula or different approaches to instruction.



Schools engage parents and the community in articulating the vision and then recruit the community as a partner in changing the school.

### **Academic Focus**

Among successful schoolwide programs, the mission includes goals that upgrade the instructional core for students by developing or adopting appropriate academic programs. Schoolwide programs focus on teaching advanced and basic skills by providing all children with a curriculum that challenges them in every subject. For example, Florida's Snively Elementary School organizes its language and mathematics instruction through thematic units in which children study culture, civilization, history, and geography by researching the contributions of their own cultures.

### **Planning and Design**

Successful schoolwide programs share two characteristics of planning and design. Successful programs are founded on at least one year of pre-implementation planning and a recognition that planning does not end with implementation, but that the project continually evolves toward ever-higher goals. The actual design of a program can vary considerably; however, successful programs build the design collaboratively. Ronald E. McNair Elementary school in North Charleston, South Carolina, is an example of a school that developed a collaborative design. A committee of faculty and parents collected data, identified problem areas, and designed a project based on proposed solutions. A team of teachers reviewed the plan and presented it to the entire faculty at a two-day retreat.

### **Family and Community Involvement**

Successful schoolwide programs actively engage families in planning and learning, and involve the community to help provide goods and services that enable schools to maximize resources. Richmond Elementary School in Salem, Oregon designed "Together with Families," a partnership program that promotes school and home relationships. Parents take various leadership roles within the school and the community, offering parenting courses and meeting in neighborhood homes to learn how to foster children's learning in school and at home.

### **Management and Organizational Structure**

The most common management change was to increase collaboration and accountability among teachers. Almost all successful projects were managed by a committee that included teachers, parents, and administrators. Becoming a schoolwide program also allows greater flexibility to change the school's organizational structure. Some of these changes included the reduction of class size, elimination of pullout programs, extension of the school day or year, and longer instructional periods in specific content areas.

### **Professional Development**

As schools adopt the schoolwide model, professional development which is closely aligned with schoolwide program goals becomes central to helping changes occur smoothly. This sometimes means that teachers and administrators return to school for specialized courses in administration and management, curriculum planning, instructional strategies, standards and assessment. In districts that most actively promote schoolwide programs, interested educators and parents also participate in workshops, seminars, and long-distance learning, and frequently contribute to curriculum planning and decision making.

### **Cultural Inclusiveness**

Schools with Title I schoolwide programs often include students from diverse racial, ethnic, and cultural groups. Successful schoolwide programs view cultural inclusiveness as a means of enhancing learning and participation for all students. These schools incorporate diversity and promote multiculturalism through planning, instruction, special activities, and school environment. By celebrating cultural influences, prejudices gradually give way to understanding and respect for differences, making room for each student's individuality.

### **Evidence of School and Student Progress**

Following one of the tenets of effective schooling—that student achievement must be closely monitored—teachers and program managers link evaluation to instruction. Schoolwide management teams track multiple indicators of student progress and combine assessment strategies, including teacher-designed tests, standardized criterion- and norm-referenced tests, portfolios of students' work, reading logs, and student writing that demonstrates their understanding of the core content areas of reading/language arts, math, science and social studies.

## **BECOME A SCHOOLWIDE PROGRAM**

The LEA determines that a school's poverty level makes it eligible to become a schoolwide program--40%

### **AND**

- The school, in consultation with its district, decides that it wants to become a schoolwide program.

### **AND**

- High-quality assistance and support is available to the school. This can be demonstrated in one of two ways:
  - the State has provided written information to the LEA that demonstrates the SEA has established a statewide system of support and improvement. The Oregon Schoolwide Planning Handbook is located on the Title IA Home page.  
[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_i/fiscal/swphandbook03\\_04.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_i/fiscal/swphandbook03_04.doc)

### **OR**

- the school demonstrates to its LEA that it will receive high-quality technical assistance and support from other assistance providers. Among the many examples of other assistance providers a school can draw on are—

It is important to recognize that it is a school's decision as to whether it will or will not choose to operate a schoolwide program.

The No Child Left Behind Act (NCLB) makes it easier for schools to operate schoolwide programs. The legislation:

- Reduces the percentage of poverty needed to qualify for schoolwide funds from 50 percent to 40 percent; and
- Permits schoolwide programs to incorporate funds from state and local programs; formula grant programs; and discretionary funds that the Secretary determines would support the schoolwide program.

**Note:** Schools may determine percent-in-poverty based on students who live in the eligible school attendance area or students enrolled in the school.

### **Required Schoolwide Components Sec.1114(b)(1)**

- to complete a comprehensive needs assessment of the entire school that is based on information which includes the achievement of children in relation to the Oregon academic content standards
- to develop a comprehensive plan, with LEA and community involvement, which would reform the total instructional program;
- to provide opportunities for all children to meet the state's proficient and advanced levels of student academic achievement
- to utilize effective scientifically research based instructional strategies and effective methods-
- to increase the amount and quality of learning time and help provide an enriched and accelerated curriculum;
- to include strategies that meet the educational needs of historically underserved populations, including girls and women;
- to address the needs of all children in the school, but particularly the needs of low achieving children and those at risk of not meeting state standards;
- to provide instruction by highly qualified professional staff;
- to support intensive and sustained professional development for teachers, principals and paraprofessionals and if appropriate parents and other staff;
- to attract high-quality highly qualified teachers to high needs schools;
- to reinforce strong parent involvement, for example, by including the provision of family literacy services, as well as other programs;
- to assist preschool children with the transition from early childhood programs to local elementary school programs;
- to include teachers in decisions regarding the use of assessments in order to provide information on, and to improve, students' performance and the overall instructional program; and
- to provide timely, effective assistance to students who experience difficulty in meeting the state's standards, including taking specific steps to involve parents in helping their children meet the standards.

### **Schoolwide Program Plan**

Each school's comprehensive schoolwide program plan must:

- be developed in consultation with the LEA and its school support team or other technical assistance provider and with the involvement of the community to be served and the individuals who will carry out the plan;
- be developed, where appropriate, in coordination with programs under the School-to-Work Opportunities Act, the Carl D. Perkins Vocational and Applied Technology Education Act, and the National and Community Service Act of 1990;
- address the components described above;
- describe how Title I funds and funds from other sources will be used to implement these components;
- include a list of state, LEA, and federal programs that will be included in the schoolwide program;
- describe how the school will provide individual assessment results to parents;
- provide for the collection and reporting of student achievement data and assessment results, and when statistically sound the report shall be disaggregated by gender, major ethnic or racial groups, limited English proficiency status, migrant students, and children with disabilities as compared to other students, and by economically disadvantaged students as compared to students who are not economically disadvantaged.

Upon completion of the schoolwide planning process the plan must be reviewed. The district reviews the plan and provides feedback and reviews for legal compliance. After any additions or changes have been made from the district feedback the plan is then submitted to Oregon Department of Education. The plan is reviewed to make sure all legal requirements have been met, feedback is provided and the schoolwide planning scoring guide with recommendations is sent to the district and school. All legal requirements need to be in the plan before the school may implement its schoolwide program. The reviewer comments must be available with the written plan to district, parents and the public.

### **Waiver**

Schools wishing to restructure outside the bounds of district policy, state or federal regulations must seek the appropriate waiver prior to implementation. This is possible under the Education Flexibility provisions. In order to seek approval for this, the school must complete an Education Flexibility waiver application and be approved by the Oregon State Board of Education. To inquire about the Education Flexibility waiver, contact the Oregon Department of Education, Office of Educational Improvement and Innovation (503) 378-3600. Periodically, schools with less than 40% poverty desire to operate as schoolwide programs. The flexibility benefits in a schoolwide program, particularly in the use of federal funds, can be an enticing reason for schools to engage in the schoolwide planning process.

Schools considering applying for a waiver to eliminate the 40% poverty requirement should carefully consider whether or not all students in the school would benefit from a school restructured to meet the needs of a high poverty population. Some questions to consider are these:

- Is there a large pool of high and/or low achieving students at the school, or is the overall academic achievement level of the school fairly flat?
- Do the income levels of the school's families vary significantly, or is the school attendance area one that attracts families of similar socio-economic status?
- Are the teachers fairly independent and convinced that few changes are needed to the school, or are the teachers committed to a complete and common restructuring of the school's plan?

If the answer is yes to the second phrase in all three questions, moving ahead with a waiver request may be a sound decision.

## **Accounting for Schoolwide Programs**

District policies having to do with the procedures for tracking federal dollars will vary. The purpose of this section is to describe the authority of Schoolwide Programs under the No Child Left Behind Act of 1994 with regard to the commingling of compensatory and regular education funds. District policies may be more restrictive, but cannot be less restrictive than the law allows.

Districts must keep Title I funds separate from all other federal, state and local funds and accounted for separately at every level of use except as Title I dollars are allocated to high poverty (40% or greater) schools which have undergone appropriate preparation and are designated as schoolwide programs.

Schoolwide programs have implemented a comprehensive restructuring plan which has been reviewed and is on file at the district office. Once operating as a Schoolwide Program, that school has the authority to combine Title I, Part A Improving Basic Programs; Title I, Part B, Even Start Family Literacy; with approval of the parents of Migrant students, Title I, Part C; Title IIA, Professional Development; Title IID Technology, Title V, Innovative Education; McKinney-Vento Homeless, Title IV Safe and Drug Free Schools, and Perkins with state and local funds to improve the overall program of the school. No requirement exists for schoolwide programs to identify separate sources of funding for activities. The dollars may be commingled and used to carry out the activities described within the Schoolwide Plan. Schoolwide Programs must meet Comparability requirements within the district.

Since the schoolwide program funds can be consolidated and used to support any expenditures of the schoolwide plan, supplanting in a schoolwide program is purely a **fiscal analysis**, not a program analysis.

A schoolwide program must use Title I funds only to supplement **the amount of funds** that would, in the absence of Title I, have been made available from nonfederal sources for the school. This includes funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency. The schoolwide program is not required to demonstrate that any particular service is supplemental to the services regularly provided in the school to all students.

The amount of Title I moneys allocated to a schoolwide program must be determined using appropriate targeting procedures (refer to Chapter 7). In districts that do not have a policy which requires schoolwide programs to keep separate funding flows, the consolidated budget page within the Annual Sub-grant Application may show the amount from each federal source as a block grant for schoolwide programs by identifying that amount (the total moving from the district to all Schoolwide Program buildings) as an "Other" line item. The schoolwide budget page in the Annual Sub-grant Application must indicate each school that has implemented its Schoolwide Plan and the amount of federal funds being block granted to each building.

High poverty schools in the planning year are still to be considered targeted assistance buildings and must, therefore, keep funding flows separate until the planning year is complete, the plan has been reviewed and is on file at the district office. All other requirements for targeted assistance programs must be upheld as well.

## **References**

Schoolwide Planning Handbook <http://www.ode.state.or.us/search/results/?id=95>

Policy Guidance, Title IA Schoolwide Programs (Archived Information)at  
[http://www.ed.gov/legislation/ESEA/Title\\_I/swpguid1.html](http://www.ed.gov/legislation/ESEA/Title_I/swpguid1.html)

## **Preschool Programs**

Creating school-based preschools with Title I-A funds is one way to serve young children considered to be at-risk. Other options for Title I-A funds include family outreach programs, parenting support and social service integration.

Since the enactment of the Elementary and Secondary Education Act (ESEA) in 1965, preschool services to eligible children have been an allowable use of Title I funds. Performance reports from State Educational Agencies for school year 2001-02 indicate that approximately two percent of children benefiting from Title I services are in preschool. This percentage may seem small, but it represents more than 300,000 children, and we anticipate that the number will grow as schools and LEAs recognize the importance of a high-quality early childhood education.

Providing high-quality early childhood experiences can help ensure that children in Title I schools and programs have the foundation to meet academic standards and experience success throughout elementary and secondary school. Several studies demonstrate the powerful effects of high-quality early childhood programs on children's later academic success. A longitudinal study of over 800 children (Cost, Quality, and Outcomes, 1999) found that children in high-quality early childhood programs displayed better language and mathematics skills, acquired more cognitive and social skills, and engaged in better relationships with classmates than did children who attended low-quality preschool programs. An evaluation of the Chicago Child-Parent Centers found that children who participated in their Title I preschool programs were less likely to repeat a grade and be referred for special education compared to children in the control group who were from similar socioeconomic backgrounds (Reynolds, 2000).

There are several ways in which preschool programs may be funded under Title I. For example—

- A participating school may use its Title I funds to operate a preschool program.
- An LEA may reserve an amount from the LEA's total allocation to operate a Title I preschool program for eligible children in the district as a whole or for a portion of the district. *Section 1112(b)(1)(K)*
- An LEA may reserve an amount from the LEA's total allocation and distribute those funds to specific Title I schools, or other comparable public early childhood education programs to operate Title I preschool programs. Head Start, Even Start, and Early Reading First are examples of such programs. *Section 1112(b)(1)(K), ESEA*

The preschool services may be provided at any location that other Title I services may be provided, including public school buildings, public libraries, community centers, privately owned facilities (including facilities owned by faith-based organizations (FBOs)), the child's home and other appropriate settings.

The U.S. Department of Education encourages Title I preschools to teach early reading and cognitive skills that provide the foundation for formal reading instruction. Early childhood education programs, including Title I preschools, should not be implementing an elementary school curriculum, either; they should be providing opportunities for children to develop early reading skills through activities that are appropriate and enjoyable for young children. Along that vein, early childhood education programs, including Title I preschools, do not de-emphasize play—rather, they encourage teachers to use constructive and imaginative play as intentional opportunities for children to develop their vocabulary, understanding, and ability to think about the world around them.

Teachers should identify and provide activities and instructional materials, based on scientifically-based reading research, that develop children's language, cognitive, and early reading skills. If the State in which the preschool is located has high-quality preschool guidelines in cognitive and language domains, we encourage the preschool to align the curriculum with those standards. If a State does not have preschool guidelines in the language and cognitive domains, we recommend that the curriculum be aligned with the State K-12 standards so that children develop the prerequisite skills so they will succeed in reading when they start formal schooling.

The curriculum should be intellectually engaging, have meaningful content, and provide multiple opportunities for developing and practicing language and cognitive skills, including the use of explicit instruction. Preschool teachers should plan the classroom environment carefully so that literacy is an integral part of everything they do. In this way literacy learning, that is reading and writing, becomes a meaningful part of their everyday lives.

The USDE Policy/Guidance information, [Serving Preschool Children Under Title I](http://www.ed.gov/policy/elsec/guid/preschoolguidance.doc) <http://www.ed.gov/policy/elsec/guid/preschoolguidance.doc> is quite comprehensive for Oregon purposes. Guidance in this document replaces all previous non-regulatory Title I guidance on serving preschool children. The guidance reflects changes in program implementation as a result of amendments made by the No Child Left Behind (NCLB) Act, and also addresses questions raised by SEAs, LEAs, and other officials regarding this law that so profoundly affects American public education. Recipients of Title I funds may refer to this guidance when administering or operating projects supported by Title I funds.

In Oregon, schools and districts interested in establishing Title I funded preschool programs are encouraged to work collaboratively with Head Start/Oregon Pre-kindergarten Programs and/or Even Start program procedures. Districts should fully investigate the level of services available in the vicinity. Title I preschools should not be in competition with existing publicly funded preschools for the same set of children, but should work together to strengthen and expand the level of services to eligible children.

Compliance with applicable Head Start Standards (45 CFR 1304.32, Education and Early Childhood) is required by law for existing and new Title I funded preschool programs



## **Transition Plans**

**Required: Preschool to Elementary School Transition Plans** (See NCLB Sec. 1114, 1115 and 1120 B.) Head Start Performance Standards (45 CFR 1304.40 and 1304.413) reflect the same requirements.

A transition plan must be in place for preschool children who have been participating in Even Start Family Literacy, Head Start/Oregon Pre-kindergarten or Title I funded Preschool programs. As participants of publicly funded preschool, these children are automatically eligible for Title I funded services in a Title I funded public school or private school that is receiving Title I services. A transition plan is designed to appropriately address the needs of these children and their families in transition from a preschool program to a public school system. The plan is to be developed, implemented and reviewed in cooperation with the preschool providers. The transition plan must include the following activities:

- systematic procedures for the transfer of children's records
- channels of communication, including teachers, social workers, and health staff to facilitate coordination of programs
- meetings involving parents, kindergarten teachers, and early childhood teachers to discuss the development and other needs of individual children
- joint transition-related training of school staff, Head Start/early childhood staff

**Required: Transition Services from Youth Corrections Facility to Public School** (NCLB, Title I, Part D, Sec. 1425)

Each correctional facility that has entered into an agreement with a district or districts to provide Title I services to delinquent youth is expected to ensure that the educational programs in the juvenile facilities are, to the degree feasible, coordinated with the student's home school; and both district and state operated corrections facilities must collaborate with local districts to provide transition assistance to help the youth stay in school once they return. Local districts are required to use a portion of their Title I Delinquent funds to create programs designed for the at-risk youth in transition from a corrections facility to the public school.

# Oregon Title I Handbook

## **CH. 8 DIVERSE STUDENT POPULATIONS**

### **Homeless Students**



**"We need to create environments that ensure the success of those students with the greatest needs, so that we can in fact ensure the success of every child."**

*Dr. Joseph F. Johnson, Past-President  
National Association for the Education  
of Homeless Children and Youth*

*Artwork reprinted with permission of artist.*

### **RESPONSIBILITIES OF STATES AND DISTRICTS**

Under NCLB Title X, the educational rights of homeless children and youth are protected by the federal McKinney-Vento Homeless Assistance Act's Education of Homeless Children and Youth Program. The law requires that state education agencies and school districts ensure that young people in homeless situations have equal access to the same free, appropriate public education, including public preschools, as provided to other children and youth (McKinney-Vento Act, Subtitle VII-B, Section 721 [1]).

Requirements for the state education agency and local school districts have increased significantly since the law was enacted in 1987. All districts are now required to designate a Homeless Liaison to identify and assist homeless students in the district, provide immediate school enrollment, expedite student records transfers and school placement, arrange for school of origin transportation when indicated, and report count data on the number of homeless students enrolled each year. District Homeless Liaisons make determinations of students' eligibility as "homeless," as well as making certain enrollment and placement decisions. Determinations by the Homeless Liaison or school district must be offered with options for appeal and dispute resolution.

Each district must have a Homeless Education Plan that includes the elements in the text box in this chapter. The submission to the state of a separate District Plan for Homeless Students is

not required at this time, however districts are advised to have documentation to address the elements of this Plan on file, to be made available upon request and/or in the event of state or federal monitoring. Most of the requirements are met through meeting standard procedures, general budgetary and program compliance, and responsiveness to required data collection. Title IA Homeless Set-Asides budget and use of funds information is recorded in the district's Consolidated Budget (spending workbook), while the needs of homeless students should be anticipated in each district's Continuous Improvement Plan (CIP).

All districts receiving allocations under Title IA are required to reserve funds (also called "Set-Asides") for serving homeless children and youth, particularly – though not limited to -- homeless students in non-Title I schools (Title IA, Section 1113[c]3A). All homeless children and youth, including preschool age children, are automatically eligible to receive supplemental services from Title IA, regardless of whether or not they attend a Title IA school.

The right to public school enrollment by homeless children and youth is further ensured in Oregon by School Admission Statute ORS 399.115(7). Under the statute, "a school district shall not exclude from admission a child located within the district solely because the child does not have a fixed place of residence or solely because the child is not under the supervision of a parent, guardian or person in a parental relationship."

### **District Homeless Liaisons**

Under the McKinney-Vento Act (Subtitle VII-B, Section 722(g)(6)[A]) each district must designate a Homeless Liaison, to identify homeless children and youth, address their educational needs, and be a primary contact to the state office and other districts regarding homeless children and youth. District Liaisons are often placed in charge of collecting count data on homeless children and youth, for required web surveys and other data collection. Support for the Homeless Liaison position is an appropriate use of Title IA Homeless set-aside funds, as a supplement to district support.

Liaisons help to ensure that homeless children and youth enroll and succeed in school and receive the educational services for which they are eligible, including preschool services. Liaisons also provide homeless children and youth and their families with referrals to health care, dental care, mental health services. Liaisons can expedite school placement, school of origin transportation and free meal program enrollment, and improve coordination and provision of local programs and services for homeless families and youths.

### **Identification of Homeless Children and Youth**

The McKinney-Vento Act (Subtitle VII-B, Section 725) defines a **homeless** individual as one who lack a fixed, regular, and adequate nighttime residence. It includes children and youth who:

- are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
- are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations;
- are living in emergency or transitional shelters;
- are abandoned in hospitals; or
- are awaiting foster care placement or are in temporary foster settings awaiting permanent placement

- have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings
- are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- migrant children and youth (as defined under NCLB Title IC – Migrant Education) who qualify as homeless because they are living in circumstances described above.

**For program and data collection purposes, a distinction is made between children and youth in homeless families, and unaccompanied homeless youth. In general, unaccompanied homeless youths lack supervision by a parent or legal guardian, having run away or been abandoned by their family.**

Determinations of whether a child or youth is homeless should be made on a case-by-case basis by the district's Homeless Liaison. Types of homeless situations can include:

- *Children and Youth in Transitional or Emergency Shelters*  
Children and youth in transitional or emergency shelters, with or without other family members, are considered homeless. This applies to families and youth in shelters for economic hardship reasons as well as to those who are displaced from housing due to natural or other disasters (e.g., flooding, house fire).
- *Children and Youth Living in Trailer Parks, Camping Grounds*  
Children and youth staying in trailer parks or camping areas because they lack adequate living accommodations should be considered homeless. Those living in trailer parks or camping areas on a long-term basis in adequate accommodations should not be considered homeless. Inadequate shelter/housing can include that which lacks electricity, plumbing, or sufficient heating, as well as housing affected by unhealthy circumstances such as head lice infestation.
- *Children and Youth Living in Motels/Hotels*  
Children and youth living in motels or hotels, with or without their families, are considered homeless if they are residing there for lack of more adequate accommodations. While motels may provide a temporary "home," conditions for such families can include overcrowding, lack of cooking facilities and food storage space, no quiet place to do homework or safe area to play.
- *Children and Youth "Doubled-Up" in Housing*  
Children living in "doubled-up" accommodations, sharing housing with relatives or friends, are considered homeless if they are doubled-up because of a loss of housing or other similar situation which forces shared housing. Families voluntarily living in doubled-up accommodations to save money generally should not be considered homeless, but should be considered eligible for services if the accommodations are such that the children involved have difficulty accessing or succeeding in school.
- *Homeless Migrant Families, Children and Youth*  
Children and youth who are eligible under Title IC - Migrant Education, and who are living in circumstances such as those described above, or who are staying in accommodations not suitable for permanent family habitation (e.g., migrant camps) should be considered homeless. The same applies to unaccompanied youth who are eligible as migrant under Title IC.

- **Unaccompanied Minors: Runaway and Abandoned Youth**  
Youth who have left home voluntarily and live in runaway shelters, abandoned buildings, the streets, or other inadequate accommodations, are considered homeless even though their parents are willing to provide them a home. Youths whose parents will not permit them to live at home, as well as minor youths who have been abandoned by parents or guardians, are also considered homeless. The term “constructive runaway” has been used in Oregon to describe homeless youth who have fled an abusive situation in their family home. Homeless youths are entitled to the same appropriate public education as all children and youth. Under Oregon school admission law ORS 339.115(7) “a school district shall not exclude from admission a child located within the district ... solely because the child is not under the supervision of a parent, guardian or person in a parental relationship.”

### **School Placement Determinations**

All districts are required under the McKinney-Vento Act to enroll each homeless child or youth in the school determined to be in the child's or youth's best interest:

- continued enrollment at the student's the school of origin for the duration of homelessness, or for the remainder of the school year if the child or youth becomes permanently housed during the academic year, or
- enrollment in the school in which non-homeless students who live in the attendance area in which the child or youth is actually living are eligible to attend.

To the extent feasible, homeless students should be kept at the school of origin, except when doing so is contrary to the wishes of the child's parent or guardian. In the case of unaccompanied youth, the Homeless Liaison should consider the views of the youth and assist with the placement decision. Should a dispute regarding the placement decision occur, a written explanation, including a statement regarding the right to appeal the decision, must be provided to the parent or guardian, or if unaccompanied, to the youth. During the appeal process, the child or youth has the right to maintain attendance at the school in which enrollment is sought -- the school of origin or the school in the attendance area in which the student currently resides – pending resolution of the dispute.

### **Transportation to School of Origin**

Districts are required to provide transportation to homeless students to attend their school of origin if requested, even if the school district does not provide school transportation to non-homeless students. (McKinney-Vento Act, Section 722(g)(1)[C]). This provision applies even though a homeless student's school of origin is in another district, as long as the transportation is feasible. The feasibility determination must be made based on the best interest of the student (e.g. length and distance of the commute, safety concerns) not on financial concerns of the district.

Whenever an inter-district case occurs, it is imperative that the Liaisons of both districts work together to establish procedures to ensure that transportation is expedited. Interdistrict disputes cannot delay immediate enrollment. In the absence of agreement between district on inter-district cases, the two districts are required to apportion the costs and responsibilities equally (McKinney-Vento Act, Section 722 (g) (1)[JII]). For more information on meeting transportation requirements, visit the ODE Homeless Education webpage and other websites recommended at the end of this chapter.

### **Dispute Resolution**

Under the McKinney-Vento Act (Section 722(g)3[E]), if a dispute arises over school selection or enrollment:

- the student shall be immediately admitted to the school in which enrollment is sought, pending resolution of the dispute;
- the parent or guardian of the student shall be provided with a written explanation of the decision, including the right to appeal the decision and the process to do so;
- the Liaison will carry out the dispute resolution process as expeditiously as possible upon receiving notice of the dispute; and
- in the case of an unaccompanied youth, the Liaison shall ensure that the youth is immediately enrolled in school pending resolution of the dispute.

The process for dispute resolution and appeals should be pre-determined. A hierarchical approach is often used, referring the case from, for example, the Liaison, to his/her supervisor or the Title I Coordinator, to the Superintendent and later to the local school board. An appeal can also be referred to the ODE State Homeless Coordinator for an expedited determination.

### **Access to Other Federal and State Programs**

Children and youth living in homeless situations should have access to all federal and state education programs for which they are eligible, despite lack of residency or the supervision of a parent or guardian. Services provided to each homeless child and youth must be comparable to services offered to other students in the school and determined to be in a student's best interest. Access must be provided to such federal programs as Head Start, Even Start, 21<sup>st</sup> Century Community Learning Centers, Special Education and Early Intervention, programs for Talented and Gifted students, programs for English Language Learners, vocational programs and Advanced Placement options and GED programs.

Under a cooperative agreement between the U.S. Department of Education and the U.S. Department of Agriculture, enrollment in the Child Nutrition Program's Free and Reduced Price meal program must be expedited for homeless students. Enrollment is automatic upon notification to the local nutrition program by the Liaison that the student is homeless. Liaisons are responsible for notifying the school meal program when the student is no longer homeless, or when the student has withdrawn from school in the district.

Liaisons should coordinate their services with local agencies and organizations providing services to homeless children and youth and their families, including programs funded under the Runaway and Homeless Youth Act, state and local housing and community services agencies, homeless shelters and transitional housing programs, Community Action agencies, the Department of Human Resources and the Commission on Children, Youth and Families.

### **Required Data Collection for All Districts**

In 2003, the federal Title X program initiated requirements for states to collect annual district counts of enrolled homeless students. In Oregon, this count is conducted as an ODE web survey, completed by districts at the end of each school year (deadlines in July). A form to pre-collect count data in the required categories is posted on the ODE Homeless Education webpage and is also available from the ODE Homeless Education office. Technical assistance is available on the collection by V-Tel and other means. McKinney-Vento Subgrant Projects

have additional data collection requirements, including a summary of state test results on homeless students served by the project.

**Monitoring of McKinney-Vento Act Requirements**

The provision of services to homeless students is among the Title IA and Title X areas monitored during consolidated program reviews. McKinney-Vento subgrant projects are monitored by the Homeless Education Specialist at the Department of Education. Monitoring tools and schedules are posted on the ODE website for each program (for more information, contact the program specialist or coordinator).

## DISTRICT HOMELESS EDUCATION PLANS

Title IA (Section 1111(a)[1]), requires that a district receiving Title IA funds must include in its district plan a plan to provide services to homeless students to ensure compliance with the McKinney-Vento Act (Subtitle VII-B, Section 722). While submission of a formal plan to the state office is not required, districts should have documentation of the required elements available upon request.

District Homeless Education Plans should include:

1. For districts receiving a Title IA allocation, assurance of access to Title IA services by homeless children and youth in all district schools, whether Title IA funded or not, and district administrative level reservation of funds (set-asides) for serving homeless students. The amount and use of these funds is recorded in the district Title IA Set-Asides Budget, page \_\_\_.
2. District policies and procedures that ensure homeless students are and will be provided school access and opportunities to meet the same high academic standards as all students are expected to meet. Districts should document efforts to update local school policies to comply with the provisions of the McKinney-Vento Act protecting admission and ensuring provision of comparable services for homeless students.
3. District assurance that local district policies and practices will not segregate or stigmatize homeless students in separate schools or in separate programs within schools, and that procedures and services are provided so as not to stigmatize children and youth as “homeless.”
4. Assurance or evidence that the district has and will post public notice of educational rights of homeless children and youth in places where families and youth are likely to be present (e.g., schools, shelters, welfare offices, soup kitchens) and in comprehensible formats (e.g., in other languages, geared for low literacy).
5. Contact information for the District Homeless Liaison, recorded in the district’s NCLB Consolidated Subgrant, updated with the state program as needed, and shared with other district and school staff, and with local service providers. Communication in the district and community about the role of the Liaison and the rights of homeless students should also be conveyed.
6. Procedures to identify homeless students during enrollment and provide outreach to unenrolled homeless children and youth in the district.
7. Provisions for immediate school enrollment of all age-eligible homeless children and youth, including provisions for public preschool and alternative school placement where available.
8. Provisions for providing placement services and transportation to keep homeless students at their “school of origin” whenever feasible, in the best interest of the student and/or at the request of the family.
9. Provisions for immediate enrollment of unaccompanied homeless youths, despite lack of parent or legal guardian’s supervision or permission, or “power of attorney” by supervising adult.
10. Procedures for homeless families and youths to appeal school placement decisions made by the district or Homeless Liaison, including written explanations, dispute resolution services and provision of services during appeal process.
11. Procedures to ensure that the expedited and confidential retrieval and transfer of homeless students’ records.
12. Assurance that federal and state data collection and reporting requirements on homeless children and youth will be met.



## **TITLE IA SET-ASIDES FOR HOMELESS EDUCATION**

### **Use of Set-Aside Funds**

Title IA Set-Asides for Homeless Education (Title IA, Section 1113) may be used by districts to provide supplemental services to homeless students, such as:

- provision of Title IA services to homeless children and youth who do attend Title IA funded schools (i.e., schools that are not Schoolwide programs or Targeted Assistance Schools);
- extended day programs, summer school, tutoring and other educational assistance
- educational services (homework assistance at other support) for homeless children and youth at shelters, transitional housing, motels and other temporary residences;
- educationally-related services for preschool-age homeless children;
- coordination of services and referrals for homeless families and youth to local shelter and human services providers;
- outreach services to children and youth living in homeless situations who are not attending school;
- other assistance, as needed, for children and youth whose lack of residence or whose adverse housing situations put their attendance and success in school at risk;
- support for services provided by the district Homeless Liaison and other staff serving homeless students;
- staff development and training provided by, and on behalf of, the Homeless Liaison and other staff serving homeless students.

### **Restrictions on Use of Homeless Set-Aside Funds**

In general, Title IA set-aside funds are intended to support educational services that *supplement, not supplant*, the regular school program. With this in mind, the USDE Non-Regulatory Guidance for the McKinney-Vento program advises that provisions which are a requirement of all districts, whether or not they receive Title I, are a responsibility of the local district and should not be fully-funded by Title IA set-asides. This requirement is most explicit in the guidance that restricts the use of Title IA set-asides for school of origin transportation for homeless students. (find quote) Once the student becomes “permanently” housed, however, Title IA set-asides could be used for continued school of origin transportation, since at that point the services would be supplemental to that which all districts are required to provide.

Further guidance suggests that a district should not fund the required Homeless Liaison staff position entirely with Title IA set-asides, however such funds can and should be used to support services provided by the Liaison to homeless students.

### **Calculation of Homeless Set-Asides**

There is no federal or state required formula or calculation method for calculating the amount of district set-asides for serving homeless students. Districts have flexibility in determining the amount based on current local data and needs assessments. Methods for calculating a set-aside amount have been suggested (see article on ODE Homeless Education website) and include a per-pupil calculation, using a base dollar amount (e.g. \$500) multiplied by the number of homeless students counted in the previous school year. Most districts opt to reserve an amount that will cover the cost of providing Liaison services.

## **COMPETITIVE MCKINNEY-VENTO SUBGRANTS**

Federal funds for competitive subgrants to local education agencies are available from the Oregon Department of Education on a limited, periodic basis. Subgrants are awarded based on the need of the district(s) for supplemental funds to address the number and needs of homeless children and youth in the project area, the quality of the proposed plan and its measurable outcomes, and the ability of the district to implement the plan. Title IA set-asides are used as matching funds in McKinney-Vento Subgrant Project budgets, in which districts must also show a foundation of local general fund support.

Districts and Education Services Districts (ESDs) are eligible to apply individually or in consortia. Typically, awards have ranged from \$10,000 to \$60,000 per school year in Oregon. There are currently 25 Subgrant Projects serving a total of 46 school districts throughout Oregon on a two-year subgrant period. If federal funding for Title X continues, the next competitive subgrant application round will tentatively occur in Spring 2006. Subgrant applications and instructions will be posted on the ODE website prior to the round.

## **HOMELESS EDUCATION PROGRAM ACTIVITIES**

### **General Activities for District Homeless Education Programs**

Districts are encouraged to implement services and activities such as those outlined below, to ensure that homeless children and youth enroll and succeed in school.

#### **Educational Services**

- Tutoring, supplemental instruction and other educational services that help homeless children and youth reach the same challenging state content and student performance standards to which all children are held.
- Before and after-school programs mentoring and summer programs for homeless children and youth. Qualified personnel may provide homework assistance, tutoring and supervision of other educational instruction in carrying out these activities.
- Developmentally appropriate early childhood education programs for homeless children of preschool age that are not provided through other federal, state or local funds.
- Expedited evaluations of homeless children and youth to measure their strengths and needs. These evaluations should be done promptly in order to avoid a gap in the provision of necessary services to such children and youth. Evaluations may also determine a homeless student's eligibility for educational programs for gifted and talented students, vocational education programs and school meals programs.
- Education and training programs for parents of homeless children and youth regarding the rights their children have, as homeless individuals, to the educational and other resources available.

#### **Professional Development**

- Programs and other activities designed to raise awareness among educators and pupil services personnel of the rights of homeless children and youth under the McKinney-Vento Act and Title IA, and the special needs such children and youth have as a result of their homelessness.
- Programs coordinating services provided by schools and other agencies to homeless children and youth to expand and enhance such services. Coordination with programs funded under the Runaway and Homeless Youth Act should be included in this effort.

### Comprehensive Services

- Referrals of homeless children and youth to medical, dental, mental and other health services.
- Pupil services programs providing violence prevention counseling and referrals to such counseling.
- Programs addressing the particular needs of homeless children and youth that may arise from domestic violence.
- Providing extraordinary or emergency services to homeless children and youth as necessary to enroll and retain such children and youth in school.

### Transportation

- McKinney-Vento and Title IA funds may be used to pay the excess cost of transportation not otherwise provided through federal, state or local funds, to enable homeless children and youth to attend schools selected under Section 722(g)(3) of the McKinney Act. The standard is that schools must provide bus transportation to students in the attendance area (beyond a certain proximity from the school). Excess costs can be incurred, for example, when keeping a homeless child at his or her "school of origin" while the child temporarily resides outside the attendance area of the school.
- If the school of origin (the school attended when the child or youth was permanently housed, or where the student was last enrolled) is outside the school's attendance area, measures beyond regular school bus transportation may be needed.
- Some districts provide bus tokens or carfare to homeless parents to escort younger children to school. Decisions regarding placement must be made with regard to what is in the child's best interest and complying, to the extent feasible, with the wishes of parents and guardians.

### School Records

- Paying fees and costs associated with tracking, obtaining and transferring records necessary for the enrollment of homeless children and youth in the school. The records may include birth certificates, guardianship records, immunization records, academic records and evaluations of homeless children and youth determining eligibility for other programs and services.

### School and Hygiene Supplies

- Providing supplies to non-school facilities serving homeless children and youth and adapting these facilities to enable them to provide services.
- Providing school and hygiene supplies to homeless children and youth in shelters, temporary housing facilities and other locations as appropriate.

### Incidental Services to Non-Homeless Students

- Disadvantaged children and youth demonstrating the most profound needs are a service priority for Title IA programs, including homeless children and youth. Non-homeless children and youth may receive incidental services if these services are provided to homeless students at the same time and if the non-homeless students are at risk of failing or dropping out of school

### **Start-up Activities for New Homeless Projects and Liaisons**

- Identify local service providers and learn about the availability and use of services in the area. Print a contact sheet for homeless and highly-mobile families and students
- Print posters and/or brochures to inform homeless families and youth of their right to attend school and encourage them to contact the school district liaison for enrollment

information and other assistance. Examples of posters are provided on the following pages. Post at grocery stores, laundromats, service agencies and in other public places. Provide translated versions for non-English language groups.

- Talk with local service providers regularly to coordinate services, track the individuals served by multiple agencies and provide case management.
- Survey school personnel about their experiences with homeless students; inform them of the homeless education project as a source of local services and a place to make referrals.
- Collaborate with other public school programs serving disadvantaged students, such as the federal programs for Head Start, Even Start, Migrant Education, Talented and Gifted, Special Education, Drop-Out Prevention, GED programs, Teen Parent Programs, Child Development Centers, etc.
- Assess nature and extent of area homelessness by analyzing state and local counts and studies and/or conducting a survey.
- Review district and school policies and practices regarding enrollment of students who may not have an address or who may not be under the supervision of a parent or guardian. Revise as needed.
- For children and youth: retrieve school and health records, assess student grade level/skill levels, expedite placement of students in appropriate schools and grade levels, update immunizations.
- Collect clothing, shoes, school supplies, hygiene products through individual, commercial and agency donations, and distribute to youth and families in need.
- Encourage homeless families and youth to keep important school and medical records (such as birth certificates and immunization records) to provide to staff at future schools and clinics. Many projects provide a sturdy folder or large envelope to parents or students, printed with important telephone numbers and other information, with pockets for storing records.
- Provide sensitivity training on homelessness for teachers, school administrators and staff, and activities for non-homeless students which promote awareness.
- Contact the County Health Department and determine when and where free vaccinations and health screenings are locally available; provide transportation to homeless families as needed.
- Arrange a "Homework Club" at a local shelter, motel or as a before or after-school activity on school grounds (inviting other at-risk students, to avoid stigmatization).
- Provide summer school and/or recreational activities opportunities for children and youth in shelters and motels.
- Recruit, train and schedule parents, community members and older students to act as mentors for younger children.

### **Additional Information and Resources**

**Oregon Department of Education, Office of Educational Improvement and Innovation  
Homeless Education Coordinator, Dona Bolt** Phone: (503) 378-3600, ext. 2727

Website: <http://www.ode.state.or.us> (Use A-Z Menu: Click on "H" for Homeless)

**National Center on Homeless Education (NCHE)** Phone: (800) 755-3277

<http://www.serve.org/nche>

**National Law Center on Homelessness & Poverty (NLCHP)** Phone: (202) 638-2535 Website:

<http://www.nchlp.org>

**National Association for the Education of Homeless Children and Youth (NAEHYC)**

Phone: (763) 545-0064 - Website: <http://www.naehcy.org>

## **Neglected and Delinquent Youth**

**Title ID: Prevention and Intervention Programs for Children and Youth Who are Neglected, Delinquent, or At Risk of Dropping Out**

### **Introduction**

#### **Overview**

Title ID authorizes assistance for educational and prevention programs for children and youth within the district and/or institutions or community day programs for Neglected or Delinquent children.

These programs are supported in recognition that:

- A large percent of youth in the juvenile justice system have poor academic achievement and have often dropped out of school;
- There is a strong correlation between academic failure and involvement in delinquent activities; and
- The educational needs of at risk youth in school must be addressed in order to help reduce the dropout rate and involvement in delinquent activities.

#### **Purpose**

The purpose of Title ID programs is to support school district programs and may involve collaboration between districts and local correctional facilities.

The purpose of these programs therefore is three-fold:

1. To provide neglected or delinquent children and youth with the services needed to make successful transitions from programs in an institution to local public schools or alternative programs or to post secondary education and employment
2. To prevent at risk students from dropping out of school.
3. To carry out high quality education programs that permit youth to:
  - Make progress in meeting Oregon content and achievement standards
  - Complete high school or earn a GED
  - Make progress toward a CIM and CAM
  - Enter training or employment programs
  - Enter post secondary education programs

### **Title I D Funds**

Districts receiving funds under Title ID must use the funds to operate:

- District-based programs for non-institutionalized, at risk children and youth, and

- Supplement state required education programs for children and youth in locally operated correctional facilities

Districts in which 30% of the students residing in facilities return to the district the district is required to:

1. To operate a dropout prevention program in a local school (s) that targets at risk children and youth.

At risk youth include school-aged youth who:

- Are at risk of academic failure;
- Have drug or alcohol abuse problems;
- Are pregnant or are parents;
- Have previously come into contact with the juvenile justice system;
- Are at least one year behind the expected grade level for their age;
- Are migrant or immigrant;
- Have limited English proficiency;
- Are gang members;<sup>6</sup>
- Have previously dropped out of school; and/or
- Have high absentee rates at school.

2. Where appropriate, Title ID funds may be used to:

- Coordinate health and social services for at risk children and youth such as day care and drug and alcohol abuse counseling if there is a likelihood that providing such services will help these children complete their education;
- Target funds to meet the needs of one or more categories of at risk children and youth; however, a district may be required to explain its rationale for choosing the categories of at risk children to be served; and/or
- Design programs that meet the special needs of children and youth at risk of dropping out such as vocational education, special education, career counseling, and securing student loans or grants.

### **Eligibility**

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<sup>6</sup> The Oregon Department of Education does not have an official definition for who can be labeled a “gang member.” However, The Oregon State Police, Gang Unit, offers the following definition” “A (street) gang is defined as a group of three or more persons that associate together and regularly engage in violent, drug, or street related crimes to the mutual benefit of the gang.” Each district, of course, is entitled to use its own definition.

Districts are eligible to receive a Title ID subpart 2 allocation if a locally operated facility serving neglected or delinquent students is located within the district boundaries and the district is required by state statute to provide educational service for those students.

Allocation amounts are determined by a census of students living in institutions for 30 consecutive days, one of which must be in October. Districts are notified by ODE of the December census submission dates.

### **Local Programs**

Each district must have a formal agreement with eligible local institutions. Each formal agreement must provide evidence of programs and services to be provided to neglected and delinquent students, including:

- Ensuring the education programs are coordinated with the student's home school, particularly with respect to special education students with an individualized educational program;
- Notifying the school when a student has received special education services while in the correctional facility;
- Providing transition assistance to help students stay in school, including coordination of services for the family, counseling, assistance in accessing drug and alcohol abuse prevention programs, tutoring, and family counseling, and ensuring that qualified staff attend to the needs of students with special education needs;
- Ensuring that educational programs are designed to help students meet the Oregon standard and the requirements for graduation or earning a GED.
- Using technology to coordinate educational programs between the districts and the facilities/institutions and the community school;
- If appropriate, involving parents in efforts to improve the educational achievement of their children and prevent further involvement of such children in delinquent activities;
- Coordinating services with other Federal, State, and local programs such as Title I, Jobs Training Partnership Act and vocational education programs; and
- If appropriate and feasible working with local businesses to develop training and mentoring programs.

### **Accountability**

The district is responsible for monitoring the facility or institution to ensure that it is carrying out its responsibilities as outlined in its formal agreement and is complying with all applicable statutory and regulatory requirements.

The Oregon Department of Education is responsible for monitoring districts for effectiveness in carrying out its formal agreement with the facility or institution, or its commitment to provide services for neglected or delinquent students. The ODE may reduce or terminate district-based

projects supported with Part D funds if they do not show progress in reducing dropout rates over a three-year period.

### Program Evaluation

Each district that conducts a prevention and intervention program for neglected or delinquent students must evaluate the program and disaggregate data on participation by sex, race (if feasible), ethnicity, and age, **no less than every three years** to determine impact on the ability of participants to:

- 1) Maintain and improve educational achievement as evidenced by progress made toward meeting Oregon standards obtaining a CIM, CAM and/or graduation or GED requirements;
- 2) Make the transition to a regular education program or the education program operated by the local education agency; and
- 3) Complete secondary school or secondary school equivalency and obtain employment after leaving the institution.

In conducting each evaluation each district shall use multiple and appropriate measures of student progress. Such measures may include criterion-referenced tests, multiple choice tests, writing samples, completion of graphic representations, standardized tests, observation checklists, performance of exemplary tasks, performance events, and portfolios of student work. In addition, alternative assessments may be used if they meet the following criteria:

- Focus on documenting individual student growth over time, rather than, comparing students with one another;
- Emphasize students' strengths (what they know), rather than weaknesses (what they don't know);
- Address the learning styles, language proficiencies, cultural and educational backgrounds, and grade levels of students.

Each district will:

- Use the results of evaluations to plan and improve subsequent programs for participating students; and
- To the extent feasible, tie the evaluations of the impact of these programs on the populations served to the Oregon content and performance standards and the Oregon State Assessment.



## **Limited English Proficient Students**

Limited English Proficient students are eligible for Title I-A services on the same basis as other children who are selected for services. However, they are also entitled to services required by law because of their limited proficiency in English. To avoid supplanting, a targeted assistance school may not use Title I-A funds to provide the level of services necessary to meet the Federal, State or local law requirements for limited English proficient children but. Title I-A funds may be used to coordinate and supplement these services as well as to provide additional direct services to these children.

**Note:** There is no prohibition from providing Title I services in the same subject area, such as English language development or native language literacy services to address limited English proficiency.

The Office of Civil Rights (OCR) has responsibility for enforcing Title VI. It allows school districts broad discretion concerning how to ensure equal education for LEP students. It does not prescribe a specific intervention strategy or type of program that a school district must adopt to serve LEP students.

OCR issues ELP program guidelines and guidance on program planning. In this state, this guidance has been summarized in OAR 581-23-100 (4) as five areas Oregon districts must address in their programs for LEP students.

Districts must:

- Have systematic procedures for identifying and assessing students who need assistance;
- Implement a planned program for ESL and academic development which, in the view of experts in the field, has a reasonable chance for success
- Use appropriately credentialed staff, curricular materials, and facilities
- Develop appropriate evaluation standards, including program exit criteria, for measuring the progress of students; and
- Assess the effectiveness of the program in preparing LEP Students for academic success in the mainstream, and modify it where needed.

In addition, under Oregon law, special classes in English (English as a second language classes) must always be provided for students who are not yet proficient enough in English “to profit from regular classroom instruction in English” (ORS 336.079).

Additionally, NCLB requires professional development for certificated staff who work with Limited English Proficient students, including administrators, that:

- is designed to improve instruction and assessment of Limited English Proficient students,
- enhance the ability of such teachers to understand and use curricula, assessment measures, and instructional strategies for LEP students,
- is based on scientifically based research demonstrating the effectiveness of the professional development in increasing children’s English proficiency or substantially increase the subject matter knowledge.

The professional development is of sufficient intensity and duration to have a positive and lasting impact on the teachers' performance in the classroom. Activities such as one-day or short-term workshops and conferences are not considered to be of sufficient intensity or duration to meet the professional development requirements.

Language Instruction and Limited English Proficient website contains ELL resources and requirements <http://www.ode.state.or.us/search/results/?id=106>

## **Migrant Students**

### **Definition of Migratory Child**

According to sections 1115(b)(1)(A) and 1309(2) of the statute and section 200.81(d) of the regulations, a child is eligible for the Migrant Education Program if:

1. The child is younger than 22 and has not graduated from high school or does not hold a high school equivalency certificate (this means that the child is entitled to a free public education or is of an age below compulsory school attendance); *and*
2. The child is a migrant agricultural worker or a migrant fisher *or* has a parent, spouse, or guardian who is a migrant agricultural worker or a migrant fisher; ***and***
3. The child has moved within the preceding 36 months in order to obtain (or seek) or to accompany (or join) a parent, spouse, or guardian to obtain (or seek), temporary or seasonal employment in qualifying agricultural or fishing work; ***and***
4. Such employment is a principal means of livelihood; *and*
5. The child:
  - a. Has moved from one school district to another.

The Migrant Education Program (MEP) is authorized by Title IC of the ESEA. The MEP provides formula grants to State educational agencies (SEAs) to establish or improve education programs for migrant children. These grants assist States in improving educational opportunities for migrant children to help them succeed in the regular school program, meet the challenging State academic content and student academic achievement standards that all children are expected to meet, and graduate from high school.

### **PURPOSE OF THE PROGRAM**

The general purpose of the MEP is to ensure that migrant children fully benefit from the same free public education provided to other children. To achieve this purpose, the MEP helps SEAs and local operating agencies address the special education of migrant children to better enable migrant children to succeed academically. More specifically, the purposes of the MEP are to:

- Support high-quality and comprehensive educational programs for migrant children in order to reduce the educational disruption and other problems that result from repeated moves;
- Ensure that migrant children who move among the States are not penalized in any manner by disparities among the States in curriculum, graduation requirements, and State academic content and student academic achievement standards;
- Ensure that migrant children are provided with appropriate educational services (including supportive services) that address their special needs in a coordinated and efficient manner;

- Ensure that migrant children receive full and appropriate opportunities to meet the same challenging state academic content and student academic achievement standards that all children are expected to meet;
- Design programs to help migrant children overcome educational disruption, cultural and language barriers, social isolation, various health-related problems, and other factors that inhibit their ability to do well in school, and to prepare them to make a successful transition to postsecondary education or employment; and ensure that migrant children benefit from State and local systemic reforms.

### **Schoolwide Programs and Migrant Education Programs**

In planning a schoolwide program, a school must take the needs of migrant children into account. If migrant children are to be part of the schoolwide program, the school should involve migrant parents in planning the program to ensure that the school effectively identifies and addresses the children's special educational needs. In addition, if the school intends to combine Migrant Education Program (MEP) funds in the schoolwide program, it must first meet the special educational needs of migrant children in consultation with migrant parents.

There are limitations on the use of MEP funds in a schoolwide program. The regulations require schools to first use the MEP funds, in consultation with migrant parents, to meet the special educational needs of migrant children before they may combine MEP funds in a schoolwide program. The special educational needs of migrant children are: 1) the unique needs that result from the effects of their migratory lifestyle, and 2) those other needs that are necessary to permit these students to participate effectively in school. The school also must document that these needs have been met before it may combine MEP funds in a schoolwide program.

### **PARENTAL INVOLVEMENT**

Parental involvement is an integral part of all Title I programs, including the MEP. Research shows that parents play a significant role in the academic achievement of their children. Therefore, it is important for parents and schools to develop partnerships and build ongoing dialogues to improve student achievement. Title I supports parental involvement by enlisting individual parents to help their children do well in school. In order to receive MEP funds, SEAs and the local operating agencies must implement programs, activities, and procedures that effectively involve migrant parents. An SEA must: 1) develop its comprehensive State plan in consultation with parents; 2) consult with parent advisory councils (PACs) regarding programs that are one school year in duration; and 3) plan and operate the MEP in a manner that provides for the same parental involvement as is required in section 1118.

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# Oregon Title I Handbook

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## **CH. 9 PARENT INVOLVEMENT**

Three decades of research provide convincing evidence that parents are an important influence in helping their children achieve high academic standards. When schools collaborate with parents to help their children learn, and when parents participate in school activities and decision-making about their children's education, children achieve at higher levels. In short, when parents are involved in education, children do better in school and schools improve.

The parental involvement provisions in Title IA recognize and reflect these three major principles:

- Shared accountability between schools and parents for high student achievement, to include expanded public school choice and supplemental educational services for eligible children in low-performing schools,
- Local development of parental involvement plans with sufficient flexibility to address local needs; and,
- Building parents' capacity for using effective practices to improve their own children's academic achievement.

New reporting provisions added by NCLB are designed to offer parents important insight into their children's education, the professional qualifications of their teachers, and the performance of the schools they attend. The notification requirements ensure that parents have the information they need to make well-informed choices for their children, more effectively share responsibility with their children's schools, and help those schools develop effective and successful academic programs. Parents now will know their children's academic strengths and weaknesses and how well schools are performing, and they will have other options and resources for helping their children if their schools are identified in need of improvement.

Parental involvement always has been a centerpiece of Title I. However, for the first time in the history of the ESEA, it has a specific statutory definition. The statute defines parental involvement as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, including ensuring:

- That parents play an integral role in assisting their child's learning;
- That parents are encouraged to be actively involved in their child's education at school;
- That parents are full partners in their child's education and are included, as appropriate, in decision-making and on advisory committees to assist in the education of their child; and,
- That other activities are carried out, such as those described in section 1118 of the Elementary and Secondary Education Act (ESEA).

### **Historical Perspective**

The previous two reauthorizations of the ESEA promoted schools' offering parents strategies to become directly involved in the educational process, thereby helping their children. The school

parent compact was introduced as well as an expectation for support in homework monitoring, enhanced communication between teachers and parents and home visits.

With advent of NCLB the law preserved the **partner in education** component but emphasized a new role for parents; that is parents as **consumers of education services** provided by the schools. To be good consumers, parents must be provided the information to make informed decisions, and this was the impetus for creating the reporting and notification requirements. The new School Choice and Supplemental Education services provisions now give parents additional control over the educational options and opportunities for their children.

## **Mandatory Reports and Notices to Parents**

### **Understandable Format and Language**

No less than 14 times in the Title I-A does the law specify that communication to parents must be “in an understandable and uniform format and, to the extent practicable in a language the parents can understand.” This is also stated in the Title IC Migrant Education program and the Title III English Language Proficiency program.

This means that, whenever practical, written translations of printed information must be provided to parents with limited English proficiency in a language they understand. However, if written translations are not practical, than it may be best to provide information to limited English proficient parents orally in a language that they understand. The LEA has flexibility in determining what mix of oral and written translation services may be necessary and reasonable for communicating the required information to parents with limited English proficiency. [Title I, Part A Final Regulations, 67 Fed. Reg. 71749 – 50, Comments and Discussion on Section 200.36; available at U.S. Department of Education website at <http://www.ed.gov/legislation/FedRegister/finrule/2002-4/120202a.html>

This requirement is consistent with Title VI of the Civil Rights Act of 1964 (Title VI), as amended, and its implementing regulations. Under those regulations, recipients of Federal financial assistance have a responsibility to ensure meaningful access to their programs and activities by persons with limited English proficiency. It is also consistent with ED policy under Title VI and Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency). The Department of Justice’s Guidance on Title VI and E.O. 13166, which provides clarification on how to determine an appropriate mix of language services, may be found in the Federal Register, 67 Fed. Reg. 41455-41472 (June 18, 2002), or online at <http://www.lep.gov>.

### **State and Local Report Cards and Adequate Yearly Progress Reports**

Each year the Oregon Department of Education and each LEA are required to provide a “report card” detailing the level of success of each school and district in raising student achievement. Since Oregon had created the report card system before new NCLB requirements came into law, the Oregon report card did not contain all required elements. To address all the elements required, the state created the AYP reports that include significant information regarding disaggregated student data, percentage of students participating in assessments, graduation and attendance rates. In the future the report card and the current AYP reports will become one reporting system.

These reports must be disseminated to all parents of students currently attending school. The reports must also be disseminated through public means, such as the information provided to the media, placed on the internet and distributed through public agencies.

## Individual Student Assessment Reports

Each Title I school must provide information to each parent on the level of achievement of their child in each of the state academic assessments. This on-going feedback in the form of annual student testing is to provide parents and teachers the opportunity to provide additional support to struggling students before they fall too far behind in their academic progress.

## Teacher Qualification Notices

### “Parents Right to Know”

No Child Left Behind Act created a new provision know, as the “Parents’ Right to Know.” This requires all LEAs to notify parents of all children in all Title I schools that they have the right to request and receive information in a timely manner regarding the professional qualifications of their children’s classroom teachers. This refers to all children in a Title I funded school, not only the children served in a Title I program, and includes both Schoolwide and Targeted Assistance Title schools.

### Highly Qualified Teacher Notification

If a child is taught by a teacher who does not meet the Highly Qualified requirements for four or more consecutive weeks, the parents must receive timely notice. For examples of notification letters go to

[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_ii/a\\_teacherquality/parentalnotifltr.pdf](http://www.ode.state.or.us/opportunities/grants/nclb/title_ii/a_teacherquality/parentalnotifltr.pdf)

### Teacher Qualifications

An LEA must report this information if a parent requests:

- Whether the teacher has met state licensing criteria for the grade levels and subject areas being taught;
- Whether the teacher is teaching under an emergency or other provisional license through which state qualifications have been waived;
- The baccalaureate degree major of the teacher and any other graduate certifications or degrees; and,
- Whether their child is provided services by paraprofessionals and, if so, what the paraprofessionals’ qualifications are.

## English Language Instruction Notification and “Opt Out”

Parents whose children meet the district’s criteria as Limited English Proficient (LEP) must be notified of their ability to have their children “opt out” of language instruction programs. This notification must take place no later than 30 days after the start of school. If a child is selected for language instruction services during the year, the LEA must send the notice to the parents within 2 weeks.

The notification must include:

- The reasons for identifying their child as Limited English Proficient and in need of the language instruction program;
- Their child’s level of English proficiency, how the level was determined and their child’s current academic achievement;

- The methods of instruction used in the program in which their child is in or will be participating, and the methods used in other programs that are available, including how such programs differ in content, instructional goals and the use of native language;
- How the program will specifically help their child learn English and meet age-appropriate academic standards for grade promotion and graduation;
- The specific exit criteria for the program;
- The expected rate of transition from the ELL program into classrooms that are not tailored for LEP students, and if this is a high school program, the expected graduation rate;
- If the child has an IEP, describe how the program will meet the objectives of the IEP;
- Information pertaining to the parents' rights that include written guidance on the right to immediately withdraw their child from the program (opt out) and the other programs available, if any.

### **Sample Notification Letters for District:**

Elementary or Middle School Parent Notification Letter (English)

[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_iii/sampleltr\\_engelemms.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_iii/sampleltr_engelemms.doc)

Elementary or Middle School Parent Notification Letter (Spanish)

[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_iii/sampleltr\\_spamelemms.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_iii/sampleltr_spamelemms.doc)

High School Parent Notification Letter (English)

[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_iii/sampleltr\\_enghs.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_iii/sampleltr_enghs.doc)

High School Parent Notification Letter (Spanish)

[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_iii/sampleltr\\_spanhs.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_iii/sampleltr_spanhs.doc)

## **Parental Involvement Policy**

### **District Parental Involvement Policy**

Each LEA must develop with parents a written parental involvement policy, and distribute this policy to parents of participating students. This policy goes to all parents whose children are participating in a targeted program or all children in a Schoolwide program.

This policy that is developed jointly with parents and agreed upon by them then becomes part of the Continuous Improvement Plan (CIP) that is submitted to the Oregon Department of Education. If parents object to the LEA's overall plan, their comments must be included when the LEA submits its plan to ODE. If an LEA has a parental involvement plan for all parents, the LEA may simply amend the current plan to meet the Title IA requirements.

Another new change from the previous Elementary and Secondary Education Act requires an annual review of the parental involvement plan to determine its effectiveness. Under the previous law, this review focused on the plan's success in increasing parental involvement; in the NCLB the focus is on whether the parental involvement plan increased the academic quality of the school.



**SAMPLE TEMPLATE\***

**District Wide Parental Involvement Policy**

From Parent Involvement – Non Regulatory Guidance , April 23, 2004  
<http://www.ed.gov/programs/titleiparta/parentinvguid.doc>

\*This sample template of a District Wide Parental Involvement Policy is not an official U.S. Department of Education document. It is provided only as an example.

**NOTE:** In support of strengthening student academic achievement, each LEA that receives Title I, Part A funds must develop jointly with, agree on with, and distribute to, parents of participating children a written parental involvement policy that contains information required by section 1118(a)(2) of the Elementary and Secondary Education Act (ESEA) (district wide parental involvement policy). The policy establishes the LEA’s expectations for parental involvement and describes how the LEA will implement a number of specific parental involvement activities, and is incorporated into the LEA’s plan submitted to the State educational agency (SEA).

School districts, in consultation with parents, may use the sample template below as a framework for the information to be included in their parental involvement policy. School districts are not required to follow this sample template or framework, but if they establish the district’s expectations for parental involvement and include all of the components listed under “Description of How District Will Implement Required District wide Parental Involvement Policy Components” below, they will have incorporated the information that section 1118(a)(2) requires be in the district wide parental involvement policy. School districts, in consultation with parents, are encouraged to include other relevant and agreed upon activities and actions as well that will support effective parental involvement and strengthen student academic achievement.

\* \* \* \* \*

**PART I. GENERAL EXPECTATIONS (Sample Template)**

NOTE: Each district in its District-wide Parental Involvement Policy must establish the district’s expectations for parental involvement. [Section 1118(a)(2), ESEA.] There is no required format for those written expectations; however, this is a sample of what might be included.

The \_\_\_\_\_ name of school district \_\_\_\_\_ agrees to implement the following statutory requirements:

- The school district will put into operation programs, activities and procedures for the involvement of parents in all of its schools with Title I, Part A programs, consistent with section 1118 of the Elementary and Secondary Education Act (ESEA). Those programs, activities and procedures will be planned and operated with meaningful consultation with parents of participating children.
- Consistent with section 1118, the school district will work with its schools to ensure that the required school-level parental involvement policies meet the requirements of section 1118(b) of the ESEA, and each include, as a component, a school-parent compact consistent with section 1118(d) of the ESEA.

- The school district will incorporate this district wide parental involvement policy into its LEA plan developed under section 1112 of the ESEA.
- In carrying out the Title I, Part A parental involvement requirements, to the extent practicable, the school district and its schools will provide full opportunities for the participation of parents with limited English proficiency, parents with disabilities, and parents of migratory children, including providing information and school reports required under section 1111 of the ESEA in an understandable and uniform format and, including alternative formats upon request, and, to the extent practicable, in a language parents understand.
- If the LEA plan for Title I, Part A, developed under section 1112 of the ESEA, is not satisfactory to the parents of participating children, the school district will submit any parent comments with the plan when the school district submits the plan to the State Department of Education.
- The school district will involve the parents of children served in Title I, Part A schools in decisions about how the 1 percent of Title I, Part A funds reserved for parental involvement is spent, and will ensure that not less than 95 percent of the one percent reserved goes directly to the schools.
- The school district will be governed by the following statutory definition of parental involvement, and expects that its Title I schools will carry out programs, activities and procedures in accordance with this definition:

*Parental involvement means the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, including ensuring—*

- (A) that parents play an integral role in assisting their child's learning;*
  - (B) that parents are encouraged to be actively involved in their child's education at school;*
  - (C) that parents are full partners in their child's education and are included, as appropriate, in decision-making and on advisory committees to assist in the education of their child;*
  - (D) the carrying out of other activities, such as those described in section 1118 of the ESEA.*
- [For States where a Parental Information and Resource Center is established] The school district will inform parents and parental organizations of the purpose and existence of the Parental Information and Resource Center in the State.

**PART II. DESCRIPTION OF HOW DISTRICT WILL IMPLEMENT REQUIRED DISTRICT WIDE PARENTAL INVOLVEMENT POLICY COMPONENTS (Sample Template)**

[NOTE: The District wide Parental Involvement Policy must include a description of how the district will implement or accomplish each of the following components. [Section 1118(a)(2), ESEA.] This is a “sample template” as there is no required format for these descriptions.

However, regardless of the format the district chooses to use, a description of each of the following components below must be included in order to satisfy statutory requirements.]

1. The name of school district will take the following actions to involve parents in the joint development of its district wide parental involvement plan under section 1112 of the ESEA:

*(List actions.)*

2. The name of school district will take the following actions to involve parents in the process of school review and improvement under section 1116 of the ESEA:

*(List actions.)*

3. The name of school district will provide the following necessary coordination, technical assistance, and other support to assist Title I, Part A schools in planning and implementing effective parental involvement activities to improve student academic achievement and school performance:

*(List activities.)*

4. The name of school district will coordinate and integrate parental involvement strategies in Part A with parental involvement strategies under the following other programs: [Insert programs, such as: Head Start, Reading First, Early Reading First, Even Start, Parents As Teachers, Home Instruction Program for Preschool Youngsters, and State-operated preschool programs], by:

*(List activities.)*

5. The name of school district will take the following actions to conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of this parental involvement policy in improving the quality of its Title I, Part A schools. The evaluation will include identifying barriers to greater participation by parents in parental involvement activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background). The school district will use the findings of the evaluation about its parental involvement policy and activities to design strategies for more effective parental involvement, and to revise, if necessary (and with the involvement of parents) its parental involvement policies.

*(List actions, such as describing how the evaluation will be conducted, identifying who will be responsible for conducting it, and explaining what role parents will play)*

1. The name of school district will build the schools' and parent's capacity for strong parental involvement, in order to ensure effective involvement of parents and to support a partnership among the school involved, parents, and the community to improve student academic achievement, through the following activities specifically described below:

- A. The school district will, with the assistance of its Title I, Part A schools, provide assistance to parents of children served by the school district or school, as

appropriate, in understanding topics such as the following, by undertaking the actions described in this paragraph --

- the State's academic content standards,
- the State's student academic achievement standards,
- the State and local academic assessments including alternate assessments,
- the requirements of Part A,
- how to monitor their child's progress, and
- how to work with educators:

*(List activities, such as workshops, conferences, classes, both in-State and out-of-State, including any equipment or other materials that may be necessary to ensure success.)*

- B. The school district will, with the assistance of its schools, provide materials and training to help parents work with their children to improve their children's academic achievement, such as literacy training, and using technology, as appropriate, to foster parental involvement, by:

*(List activities.)*

- C. The school district will, with the assistance of its schools and parents, educate its teachers, pupil services personnel, principals and other staff, in how to reach out to, communicate with, and work with parents as equal partners, in the value and utility of contributions of parents, and in how to implement and coordinate parent programs and build ties between parents and schools, by:

*(List activities.)*

- D. The school district will, to the extent feasible and appropriate, coordinate and integrate parental involvement programs and activities with Head Start, Reading First, Early Reading First, Even Start, Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children, by:

*(List activities.)*

- E. The school district will take the following actions to ensure that information related to the school and parent- programs, meetings, and other activities, is sent to the parents of participating children in an understandable and uniform format, including alternative formats upon request, and, to the extent practicable, in a language the parents can understand:

*(List actions.)*

**PART III. DISCRETIONARY DISTRICT WIDE PARENTAL INVOLVEMENT POLICY COMPONENTS (Sample Template)**

**NOTE:** The District wide Parental Involvement Policy may include additional paragraphs listing and describing other discretionary activities that the school district, in consultation with its parents, chooses to undertake to build parents' capacity for involvement in the school and school system to support their children's academic achievement, such as the following discretionary activities listed under section 1118(e) of the ESEA:

- involving parents in the development of training for teachers, principals, and other educators to improve the effectiveness of that training;
- providing necessary literacy training for parents from Title I, Part A funds, if the school district has exhausted all other reasonably available sources of funding for that training;
- paying reasonable and necessary expenses associated with parental involvement activities, including transportation and child care costs, to enable parents to participate in school-related meetings and training sessions;
- training parents to enhance the involvement of other parents;
- in order to maximize parental involvement and participation in their children's education, arranging school meetings at a variety of times, or conducting in-home conferences between teachers or other educators, who work directly with participating children, with parents who are unable to attend those conferences at school;
- adopting and implementing model approaches to improving parental involvement;
- establishing a district wide parent advisory council to provide advice on all matters related to parental involvement in Title I, Part A programs;
- developing appropriate roles for community-based organizations and businesses, including faith-based organizations, in parental involvement activities; and
- providing other reasonable support for parental involvement activities under section 1118 as parents may request.]

\* \* \* \* \*

**PART IV. ADOPTION (Sample Template)**

This District wide Parental Involvement Policy has been developed jointly with, and agreed on with, parents of children participating in Title I, Part A programs, as evidenced by

\_\_\_\_\_.

This policy was adopted by the name of school district on mm/dd/yy and will be in effect for the period of \_\_\_\_\_. The school district will distribute this policy to all parents of participating Title I, Part A children on or before \_\_\_\_\_.

\_\_\_\_\_  
(Signature of Authorized Official)

\_\_\_\_\_  
(Date)

## **Title I School Parental Involvement Policy**

Each Title I school must develop and distribute its own written parental involvement policy specific to that school. Parents are involved in the development and approval of the policy. If the school already has a policy that applies to all parents, the school may simply amend the current policy to meet the Title I requirements.

Elements to include in the policy are:

- Convene an annual meeting at a convenient time, to inform parents of their school's participation in Title I and the services/program provided and inform them of their right to be involved in the program;
- Offer a flexible and regular number of meetings and address use of Title I funds to pay for related expenses such as transportation, child care, home visits;
- Involve parents in an ongoing and timely way in planning, review and improvement of Title I programs;
- Provide timely information about the school's Title I or Schoolwide programs to parents, describe the curricula, the student assessments and proficiency level expected;
- Provide the opportunities for regular meetings where parents can provide input, and;
- Provide parents with an opportunity to submit dissenting views to the LEA if a school's Schoolwide plan is not acceptable to them.

The following is an example of a school's Parent Involvement Policy, it is not meant as a template but rather a sample. Make sure all the elements stated above is in the school parent involvement policies developed in your district. To view a sample of a school level Parent Involvement Plan (English or Spanish)

<http://hollyoak.ca.campusgrid.net/home/Title+1/Parent+Involvement+Policy>

### **School-Parent Compacts – Shared Responsibility for High Academic Achievement**

A School-Parent Compact is developed jointly by parents and staff as a component of the school's parent involvement policy. This compact outlines: a) how parents, school staff and students will share the responsibility for improved student academic achievement, and b) the means by which the school and parents will build and develop a partnership to help children meet or exceed the state academic standards.

The compact must include:

- A description of the school's responsibility to provide high quality curriculum and instruction in a supportive and effective learning environment that enables the children to meet the state's academic achievement standards;
- The ways each parent will be responsible for supporting their child's learning, for example, monitoring attendance, homework completion and TV watching, and volunteering and participating in school events.
- Explanation of the importance of ongoing communication between parents and teachers, at a minimum to include:

- Parent-teacher conferences in elementary school at least one time per school year, during which the compact is discussed;
- Frequent progress reports to parents
- Reasonable access to staff, such as, how and when parents can contact teachers, and how to request the opportunity to volunteer or observe a classroom.

The Parent Involvement Guidance provided by the U.S. Department of Education provides template with required and suggested elements for a parent school compact:

<http://mcoeweb.marin.k12.ca.us/es/nclb/TIProgSchoParent.pdf>

### **Building Capacity for Involvement**

To ensure effective involvement of parents and to support a partnership among the school, parents and the community to improve student achievement, each school and LEA are required to carry out certain activities and encouraged to carry out other activities.

Each LEA and Title I Funded School must:

- Provide assistance to parents of Title I children in understanding such topics as the state's academic standards, the assessments being used, the Title IA requirement, how to monitor their child's progress, and how to work with educators to improve children's achievement;
- Provide materials and training, such as literacy training and technology training, to help parents work with their children to improve achievement;
- Educate teachers, administrators, pupil service personnel and other staff with the assistance of parents, in the value of parent contributions and in how to reach out to, communicate, and work with parents as equal partners;
- To the extent feasible, coordinate and integrate parental involvement programs with Head Start, Even Start and other preschool programs;
- Ensure that information regarding meetings and activities are in a format, and to the extent possible, in a language understandable to parents; and,
- Provide other reasonable support for parent involvement activities, such as parents may request.

Each LEA and Title I Funded School may:

- Involve parents in the development of training for parents, principals and other educators to improve the effectiveness of the training;
- Provide necessary literacy training for parents using Title IA funds, if all other LEA funds have been exhausted;
- Pay reasonable and necessary expenses associated with parents participating in parental involvement activities;
- Train parents to reach out to other parents to become more involved in the school;
- Arrange school meetings at a variety of times or conduct home visits for conferences or meetings;
- Adopt and implement model approaches to improve parental involvement;
- Establish a district wide parent advisory council to provide advice on all matters related to parental involvement in Title schools, and;

- Develop appropriate roles for community-based organizations and businesses in parent involvement activities.

### **LEA Funding for Parental Involvement**

An LEA that receives a Title I, Part A allocation of greater than \$500,000 must reserve at least 1 percent of its Title I, Part A allocation to carry out parental involvement activities, including promoting family literacy and parenting skills. The percentage reserved for parental involvement must be calculated on the basis of the LEA's total Title I, Part A allocation. LEAs with a Title I, Part A allocation of \$500,000 or less must carry out the requirements of parental involvement, but are not required to reserve any specific amount from their Title I, Part A allocation to do so.

No Child Left Behind Act has made a significant change in the funding at the LEA level regarding parental involvement. The law now specifies that at least 95% of the funds reserved in a district Set-Aside for Parental Involvement must be re-distributed to the schools. In re-distributing the amount of funds the LEA reserves for schools to carry out the parental involvement provisions, an LEA may use the same formula it uses to determine the per-pupil allocations for those schools or it may distribute those funds in another manner. An LEA may use any one of or a combination of factors; for example, it may choose to allocate funds to schools in improvement status; base its allocation on the results of the LEA's annual evaluation of parental involvement activities; or make use of the SEA's annual adequate yearly progress review of how its LEAs are carrying out their responsibilities for parental involvement activities.

The LEA must involve parents of Title I, Part A participating children in decisions about how it allots to schools the funds the LEA has reserved for parental involvement activities. The involvement of parents should be in a manner consistent with the definition of parental involvement. In terms of process and representation, an LEA may choose to use its district-wide parent advisory council (if it has chosen to establish one) to provide advice on this and other matters relating to Title I, Part A programs.

If the LEA sets aside more than 1% for parental involvement, it may retain the excess of the required one percent for district-wide parental involvement activities. However, the requirement to allocate an equitable amount for the involvement of private school parents applies to the entire amount set-aside. See the Chapter on Private Schools for specific information regarding equitable parent involvement activities for parents of private school students.



## **Research Based Resources**

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**The following resources represent a sample of the research-based resources available on parental involvement. This list is not exhaustive. The U.S. Department of Education is providing the list of resources below for the reader's convenience, and no official endorsement by the U.S. Department of Education is intended or should be inferred. The views expressed by the authors are their own, and do not necessarily represent the policies of the Federal government or the U.S. Department of Education.**

**\* Southwest Educational Development Laboratory. (2003) *Diversity and School, Family, and Community Connections*. Austin, Texas.**

This synthesis reviews research findings from 64 studies that address some aspect of diversity as it relates to student achievement and school, family, and community connections. It describes the procedures used to select the studies and a brief overview of the broad concepts related to diversity and family involvement that the studies address. The author lists the studies and publication date, categorizing them according to the research method used, populations addressed, and educational level addressed. A brief description is provided of the principal limitations of the studies. The primary audience is practitioner leaders — superintendents, principals, curriculum supervisors, lead teachers, family involvement staff, community leaders, and others who may be responsible for or interested in helping to shape local policy or practice regarding school, family, and community connections. The report is organized so that, depending on their needs and interests, local leaders may quickly access practical information, or may explore the topic in depth.

**\*Henderson, Anne, T., and Mapp, Karen, L. (2002) *A New Wave Of Evidence: The Impact Of School, Family And Community Connections On Student Achievement*. Austin, Texas: National Center for Family and Community Connections with Schools**

This review examines the growing evidence that family and community connections with schools make a difference in student success. The authors look at 51 recent studies - all but two published between 1995 and 2002, covering a range of perspectives and approaches. The studies, some of which are based on scientific research, fall in three broad categories: 1) studies on the impact of family and community involvement on student achievement; 2) studies on effective strategies to connect schools, families, and communities; and 3) studies on parent and community organizing efforts to improve schools.

**Mattingley, D.J, Prislin, R., McKenzie, T.L., Rodriquez, J.L., and Kayzar, B. (2002) *Evaluating Evaluations: The Case Of Parental involvement Programs*. *Review of Educational Research*, 72(4), 549-576.**

The authors analyzed 41 studies that evaluated K-12 parental involvement programs in order to assess claims that such programs are an effective means of improving student learning. The authors found that the majority of existing evidence regarding the links between parental involvement and student achievement comes from correlation studies rather than rigorous, systematic evaluations of the impact programs have on student learning (p.550). Of the 41 studies, the authors found only four that used the most rigorous research design. Two of these studies found significantly improved performance on standardized achievement tests among children whose parents participated in the intervention program; two found no significant effects. All four of the studies addressed minority and/or low-income populations. Each focused on training parents or older siblings to help tutor students or to help with homework. The two programs also extended the duration of parent training over a longer period than the two showing no significant effect. The authors also noted that the majority of intervention programs they reviewed focused on changing parent behavior – especially in the areas of parenting and supporting home learning – rather than on changing teacher practices or school structures.

**\*Starkey, P. and Klein, A. (2000) Fostering Parental Support For Children's Mathematical Development: An Intervention With Head Start Families. Early Education and Development, 11( 5), 659-680.**

This article describes two experimental studies of a four-month program that engaged about 30 families to develop math skills in Head Start children, ages 4-5 years. Another 30 families were assigned to control groups. At two sites in the San Francisco area, one serving African American families and the other Latino families, staff gave classes for mothers and children and loaned math activity kits for use at home. The program supported math knowledge, not literacy. Control group families did not attend classes or have access to the library. In both programs, the researchers found that parents were willing and able to work with their children on math when given training and materials. The children in the program developed greater math knowledge and skills than the control group children. The authors believe that the two key factors in the programs' success were the work of parent liaisons and the provision of math kits to families to use at home.

**Armbruster, B., Lehr, F., Osborn, J.B. (2003) Proven Ideas from Research for Parents: A Child Becomes A Reader (K-3). Second Edition. Portsmouth, New Hampshire: RMC Research Corporation.**

This booklet contains a short summary of what scientific research says about how children learn to read and write; things that parents and other caregivers can do to enable a child to become a successful reader and writer at three different grade levels; a list of helpful terms; and ideas for books and organizations that may be of interest to parents and other caregivers. The publication was funded through a grant from the National Institute for Literacy, an independent federal organization that supports the development of high-quality State, regional and national literacy services.

**The Partnership for Reading, U.S. Department of Education. (2001) Put Reading First: Helping Your Child Learn to Read (A Parent Guide, Preschool through Grade 3.**

This brochure was published by the Partnership for Reading, a collaborative effort of the National Institute for Literacy (NIFL), the National Institute of Child Health and Human Department (NICHD), and the U.S. Department of Education to make evidence-based reading research available to educators, parents, policymakers and others with an interest in helping all people learn to read well.

**Hiatt-Michael, D.B. (Ed). (2001) Promising Practices for Family Involvement in Schools. Greenwich, Connecticut: Information Age Publishing**

This first volume in Family School Community Partnership provides educators and practitioners with promising practices, theories, and research that are designed to bring families and schools together. It contains major frameworks for understanding family involvement and government support of family involvement projects. The chapter authors present a theoretical base for understanding school, family, and community partnerships and research that supports promising practices. The sponsor of this series is the Executive Board and membership of the Family, School, Community Partnership Special Interest Group of the American Educational Research Association.

**\*Shaver, A.V., and Walls, R.T. (1998) Effect Of Title I Parental involvement On Student Reading And Mathematics Achievement. Journal of Research and Development in Education, 31(2), 90-97.**

This quasi-experimental study examines the effects of parental involvement on the reading and math achievement of 335 Title I students in second through eighth grades, and their parents. The students who participated in the study all were receiving remedial help in reading and math. Information about their achievement levels was based on pre- and post-tests on the Comprehensive Test of Basic Skills (CTBS/4) in reading and math. The district developed a series of three-hour parent workshops that involved information, training, and discussions. Each Title I teacher was required to attend at least

four of these sessions during the school year to promote five types of involvement - 1) parenting; 2) parent-teacher communication; 3) parental involvement at school; 4) parental involvement at home; and 5) program decision-making. The researchers found that students whose parents regularly attended school-based parent workshops made greater gains in reading and math than students with less-involved parents.

**\*Voorhis, V. and Frances, L. (2001) *Interactive Science Homework: An Experiment In Home And School Connections*. National Association of Secondary School Principals, Bulletin, 85(627), 20-32.**

This article describes the results of a study on involving families in the homework of their children using Teachers Involve Parents in Schoolwork (TIPS), an interactive homework process. This study compared the effects of TIPS homework with homework that has the same content, but is not interactive. Three sixth grade classes and two eighth grade classes, totaling 253 students in all, participated for 18 weeks. The participants received weekly homework assignments with learning goals. Only families with TIPS homework were told about how students would involve them in their work. TIPS students earned significantly higher grades than students who did not use interactive homework.

**\*Reynolds, A. J. (2001) *Success in Early Intervention: The Chicago Child-Parent Centers*. Lincoln, Nebraska: University of Nebraska Press.**

In this monograph, the author investigates the long-term effects of the Child-Parent Center Program (CPC), a large-scale early childhood intervention program for economically disadvantaged children. The program operates about 24 centers through the Chicago public schools to children ages 3 to 9 and their families. The central operating principle of the program is that direct parental involvement is expected to enhance parent-child interactions, parent and child attachment to school, and social support among parents, and consequently to promote children's school readiness and social adjustment. Programs for parents include a parent resource room in each center and a parent resource teacher who [oversaw] parent activities both within the center and with the community. Among other topics, this study investigates family outcomes of program participation as secondary to child outcomes.

**Snow, C.E., Burns, S.M., & Griffin, P. (Eds.). (1998). *Preventing Reading Difficulties in Young Children*. Washington, D.C.: National Academy Press.**

This book is a summary report developed from the findings of the Committee on the Prevention of Reading Difficulties in Young Children. It examines research findings to provide an "integrated picture of how reading develops and how reading instruction should proceed (p.vi)." Of particular note is chapter 5 as it includes a review of scientific research on parental and family influences on children's development of language and early reading skills. The text also includes a discussion of the research on the importance of parents reading to their children and presents research-based strategies for parents to use to gain maximum benefit from parent-child book reading.

**\*Chrispeel, J.H. and Rivero, E. (2001) *Engaging Latino Families For Student Success: How Parent Education Can Reshape Parent's Sense Of Place In The Education Of Their Children*. Peabody Journal of Education, 76(2), 119-169.**

This study offers some areas for consideration by school staff wishing to initiate parental involvement strategies to engage Latino families. It also provides anecdotes that highlight some of the barriers to parental involvement. The study examined the effect of a program intervention called the Parent Institute for Quality Education (PIQE) on 198 immigrant parents' sense of place in their children's education. The most prevalent changes for participants were the increased number of literacy activities, such as reading more and going to the library more frequently, and the discovery that they could initiate contact with the school and not have to wait for the teacher to extend a hand. The authors conclude that concepts about the parents' roles, based on cultural traditions and prior

experiences that limit the types and levels of involvement can affect how parents interpret a school's invitations and opportunities to participate. They also demonstrate, however, that these roles are not fixed and may be altered by information provided by a cultural-broker initiative such as the PIQE.

**\*Desimone, L., Finn-Stevenson, M., and Henrich, C. (2000) Whole School Reform In A Low-Income African American Community: The Effects Of The CoZi Model On Teachers, Parents, And Students. *Urban Education*, 35(3), 269-323.**

The purpose of this quasi-experimental evaluation is to measure the effects of the CoZi model of school reform in a school serving primarily African American, low-income students. The CoZi model seeks to address the needs of preschool and kindergarten children and their families by providing social services through the school and a system for reorganizing school decision-making and service provision to develop a cohesive community of parents, teachers, and students. There were significantly higher parent and community participation rates in the CoZi school than in a comparison school with similar staff and student demographics. The CoZi school also reported more positive attitudes toward parental involvement and more programs to bring parents into the school. In addition, the CoZi school also had a significantly better school climate, especially as reported by teachers. This evaluation gives a comprehensive analysis of a specific school reform approach that emphasizes parental involvement and the impact that it had on school climate and culture, parent and teacher satisfaction, and student achievement.

\*For more information and inquiries about these studies, contact the National Center for Family & Community Connections with Schools, Southwest Educational Development Laboratory; 211 East Seventh Street (Second Floor); Austin, Texas 78701-3281; Phone: 800-476-6861; Fax: (512) 476-2286; Web: <http://www.sedl.org/connections/>

### **Online resources LEAs might wish to explore.**

- Becoming a Community School: A Step-by-Step Guide to Bridging the School-Family Gap. Includes strategies, programs, action guide and sample resources. Available at <http://www.psinnovation.org/PSI/btft11.html>
- National Center for Family Literacy <http://www.familit.org/index.cfm>
- Parenting involvement: Literature review and promising practices. Provides an overview of parent involvement programs, targeted ages, strategies, and additional links. <http://www.ncrel.org/sdrs/pidata/pi0over.htm>
- Northwest Regional Educational Laboratories has an extensive list of print and other resources. Available online at <http://www.nwrel.org/cfc/publications/index.html>
- "Tips for Parents" in Spanish and English: Social Advocates for Youth has an online tips for parents. To view the parent tips, visit <http://www.saysandiego.org/parentinfo.htm>
- "Un futuro brillante empieza en un libro" (A brilliant future begins with a book), Spanish family literacy initiative website for families (<http://www.rif.org/leer>) including resources, PSAs and parent video.

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# Oregon Title I Handbook

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## **CH. 10 PRIVATE SCHOOLS**

The Title IA program provides supplemental educational services so that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Generally, to qualify for assistance under Title IA, a student must reside within the attendance area of a participating public school located in a low-income area and be failing, or at risk of failing, to meet student academic achievement standards.

Under Title I, LEAs are required to provide services for eligible private school students, as well as eligible public school students. In particular, NCLB Sec1120 requires a participating LEA to provide eligible children attending private elementary and secondary schools, their teachers, and their families with Title I services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families.

The Title I services for private school students must be developed in consultation with officials of the private schools. [Timeline for LEA Consultation with Private School Officials](#) is provided to support Title I Coordinators in the consultation process. The NCLB strengthened these requirements by, among other things, requiring meetings with private school officials and a written affirmation signed by private school officials that the required consultation has occurred. A sample form is located at this link [Affirmation of Consultation with Private School Officials](#).

The amount of Title I funds allocated to each participating public school attendance area is determined mainly on the basis of the total number of low-income students—both public and private-- residing in each area. Expenditures for private school students in each area generally are determined based on the proportion of students from low-income families residing in that area who attend private school.

The Title I services provided by the LEA for private school participants are designed to meet their educational needs and supplement the educational services provided by the private school. These services may be provided by the LEA, or by a contractor who is independent of the private school and any religious organization. Title I services or benefits must be secular, neutral, and non-ideological.

### **Key Points:**

- Private school students generate Title I funds if:
  - they meet the poverty criteria
  - **and** live in the district
  - **and** in a public school attendance areas that receive Title I funds
- Just as in any public school Targeted Assistance program, private school students who are eligible for Title I services are those failing to meet high academic standards and may or may not be the same students that generated Title I funds.
- Services must be equitable but they need not be the same services for children attending public schools.

- Under *Agostini v. Felton*<sup>7</sup>, public school teachers may provide supplementary instructional services under Title I at religiously affiliated private schools. If space is available in the private schools of the children being served, LEAs may offer Title I services in those schools. However, LEAs may continue to provide Title I services outside the private schools if there is no space available in the private schools.

## **Consultation and Determining Services**

Consultation with officials from private schools is an essential requirement in the implementation by an LEA of an effective Title I program for eligible private school children, their teachers, and their families.

Consultation involves discussions between public and private school officials on key issues that affect the ability of eligible private school students to participate equitably in Title I programs. Effective consultation provides a genuine opportunity for all parties to express their views and to have those views considered. Successful consultation establishes positive and productive working relationships that make planning easier and ensure that the Title I services provided meet the needs of eligible students.

A unilateral offer of services by an LEA with no opportunity for discussion is not adequate consultation. Only after discussing key issues relating to the provision of Title I services should the LEA make its final decisions with respect to the Title I services to be provided to eligible private school children, their teachers, and their families.

Annually an LEA must contact officials of private schools with children who reside in the LEA regardless of whether the private school they attend is located in the LEA. One way to accomplish this is for the LEA to extend an invitation to officials of the private schools and convene a meeting with them at which LEA officials explain the intent of Title I and the roles of public and private school officials and provide opportunities for the private school officials to ask questions. It is not adequate consultation merely to send a letter to officials of the private schools explaining the intent of Title I.

Consultation by an LEA must include meetings between the LEA and appropriate private school officials and must occur before the LEA makes any decision that affects the opportunity for eligible private school children, their teachers, and their families to participate in Title I programs. For example, if the LEA signs teacher contracts or orders supplies and equipment for the Title I program in the spring, the LEA must consult with the appropriate private school officials before signing those teacher contracts with Title I teachers or ordering supplies and equipment to provide Title I services for private school students. Refer to Sample Initial Letter to Private Schools at the end of this chapter.

After receiving an offer of equitable services, the private school officials or parents may choose to have the children participate in only some of the services. A district meets its responsibility to provide services even if private school officials or parents wholly or partially refuse the services. If the parents or officials refuse services the district documents this and keeps the information on file.

The district, in consultation with appropriate private school officials, determines the appropriate Title I services based on the needs of the private school students. Title I services may be provided in subject areas or at grade levels that are different from those provided public school students, as long as these services are provided in the same grade-span as the services provided to public school children.

Note: Schoolwide programs may not be operated in private schools.

After consultation with private school officials, an LEA may provide Title I services other than direct instruction if the provision of services, such as counseling, staff development, and parental involvement is appropriate to assist those children identified as failing or most at risk of failing to meet high student academic achievement standards. The district must measure the effect of the services on the academic achievement of participating children.

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### **Determining Title IA Funds**

Determining equality of funding can be complicated by a number of factors relating to the method used by the district to target public schools for Title I services. If the district uses school attendance areas for targeting, begin the process by determining which private school children live in eligible public school attendance areas. With the private school officials, determine the number of those children who live in families of poverty. This may be accomplished through a survey of the children who live in eligible attendance areas. Each child who lives in an eligible public school attendance area and is poor generates funding for the purpose of serving the children who are at risk of failing to meet high academic standards. The private school should use the same poverty criteria as that used by the school district. Many districts use free and reduced lunch eligibility so the same criteria can be used for a private school even if the school does not participate in the Free and Reduced Lunch program.

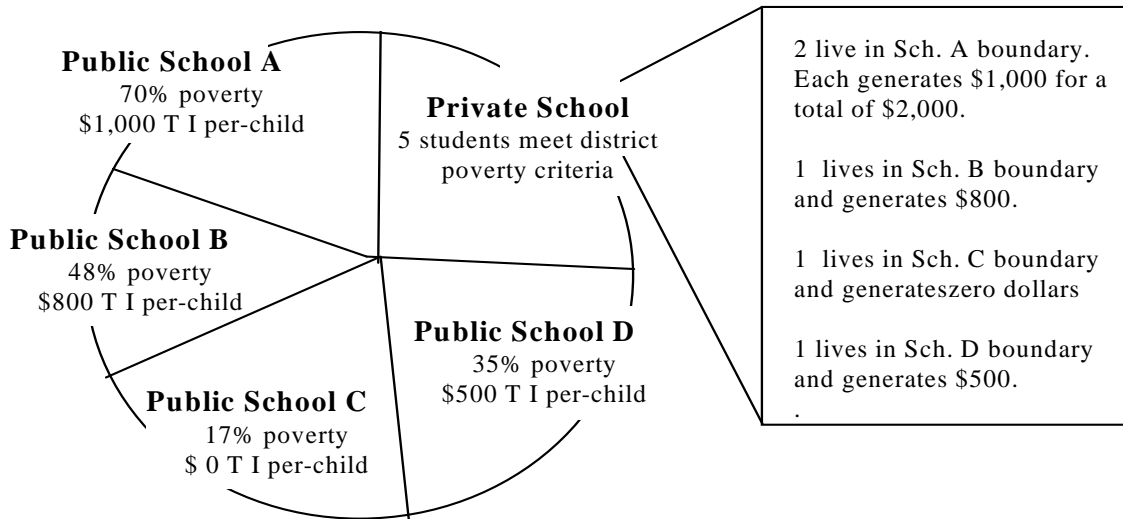
In order to determine equal funding for services to private schools, the district will probably need the addresses of the private school children who meet the district poverty criteria.

⇒ If the district distributes the **same per child** amount of federal dollars to each Title I public school, that per child amount is multiplied by the number of private school children who live in eligible public school attendance areas.

If the district distributes **varying per child amounts** to its eligible Title I public schools, the private school children who meet the district's poverty criteria must be separated by address and by the public school each child would attend if not enrolled in a private school. The amount of Title IA dollars reserved for private school students is whatever amount goes to their respective public schools. (See example on next page.)

**Students who are eligible for Title I services are those failing to meet high academic standards and may or may not be the same students that generated Title I funds.**

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**REMINDERS:**

1. It is the district’s responsibility to seek out and consult with private school officials in order to serve eligible children.
2. Title I dollars do not “flow through” to private schools. The district is responsible for the provision of services.
3. When a district contracts with an outside agency as its means of providing services to eligible children in private schools, the contracting agent/agency must be a non-sectarian, third party. Districts may not contract directly with the private schools or individual religiously affiliated staff member of a private school whose students are receiving Title I services.
4. Annual assessment of student academic progress and a subsequent annual evaluation of the Title I program is required. The district is accountable for the academic progress of participating private school students.

**Collecting poverty data on private school children**

Districts are responsible for collecting the poverty data from the private schools that chose to participate. The district may calculate the number of children who are from low-income families attending private schools in several ways:

- Using the same measure of poverty
- Using comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable.

The district may use a survey of private school children to determine: a) the geographic information verifying residence in a participating public school attendance area; b) grade level of each child; and c) income level of parents. Districts do not need to collect the names of the children unless there is a need to verify the accuracy of the poverty count. Private school officials must keep verification information in their files.

The district, in consultation with the private school officials, selects a method for collecting poverty data. Poverty data may be collected annually or biennially, at the convenience of the district and private schools.

- **Using comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable.**



- a. *In order to obtain the number of private school children from low-income families, an LEA may use a survey to obtain poverty data comparable to those used for public school students. To the extent possible, the survey must protect the identity of families of private school students. The only information necessary for an LEA to collect in such a survey of private school children is-*
- (1) geographic information verifying residence in a participating public school attendance area;
  - (2) grade level of each child; and
  - (3) income level of parents.

An LEA should not require that the private school officials give the names of low-income families.

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#### EXAMPLES OF GOOD SURVEY PRACTICES:

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Surveys yielding good data have some common characteristics. The survey itself should be simple and understood by parents, including parents with limited knowledge of English. Larger text and inclusion of graphics assist limited English speakers in comprehension. Letters of explanation are sent to principals, and meetings are held with them to explain the necessity and importance of the survey. Principals are encouraged to meet with the parents and then distribute the surveys. After a period of time has lapsed, during which the surveys should have been received, the principals begin to follow up with those parents who have not returned the surveys. Parents are assured to the extent possible that the completed individual survey forms will be kept in confidence at the private school.

One school district finds that sensitive data, such as income level, are most easily collected when the families providing the data feel that their privacy is being protected. For this reason they use only a numbering system to identify the families and do not require any names on the form. Each principal is given a copy of the form and instructed to number the forms and keep a log. Parents are informed that their names will only be matched to the numbers if they do not return the form (i.e., in order to contact them). Printed at the bottom of the form is "This form has been numbered to protect your privacy. Once we receive the information requested, any linking of this number to your family's name will be kept in strict confidence." It is important to note that immigrant parents who are asked for official data may have concerns regarding their legal status, and that attempt should be made to explain to parents that the data are for school use only.

### **Identifying Private School Students Who will be Eligible for Title I Services**

Title I regulations defines Title I eligible private school children as those who reside in participating public school attendance areas of the district, regardless of whether the private school they attend is located in the district. Thus, the district in which the child resides is responsible for providing services to the child, but it may arrange to have services provided by another district and reimburse that district for costs.

To be eligible for Title I services, a private school child must meet the requirements of Title I Targeted Assistance Programs, which requires the use of multiple, educationally related, objective criteria in selecting children to participate in the Title I program. Children from preschool through grade 2 are selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

Student eligibility for Title I services for private school children is determined by:

- (1) Residence in a Title I public school attendance area, and
- (2) Educational need.

Poverty is not a criterion. Criteria for service are determined in consultation with private school officials. The district must establish multiple, educationally related, objective criteria to determine which private school children are eligible for Title I services, and, within the eligible group, which children will be served.

Title IA funding may not be used to identify private school children who are eligible to participate. Title IA funds may be used to select participants from among those who are eligible and to determine the needs of the students. It is the district's responsibility to verify that the eligible private school children reside in participating public school attendance areas.

### **Delivery of Instructional Services**

After consultation with appropriate private school officials, the district must design a Title I program that meets the needs of private school participants. The district is responsible for planning, designing, and implementing the Title I program and may not delegate that responsibility to the private schools or their officials. The district must give primary consideration to providing extended learning time and a high-quality curriculum.

Based on the needs of the children to be served, the district must provide an instructional program that not only supplements but also is well coordinated with the instruction that the private school children are receiving in their regular classrooms. This program should complement classroom instruction and should not be a separate instructional program.

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

**Services for participating private school children include, but are not limited to, the following:**

- Instructional services provided by public school employees or third-party contractors;
- Extended-day services;
- Family literacy programs;
- Counseling programs;
- Computer-assisted instruction (CAI);
- Home tutoring; and,
- Instruction using take-home computers.

#### **Title IA Funds**

Private school officials have no authority to obligate or receive Title I funds. The district must maintain control of Title I funds, materials, equipment, and property. No Title I funds may be paid to a private school. Title I services for private school participants may be provided at various locations, including the private school, neutral sites, or public schools

#### **Title IA staff and Private Schools**

Title I services must be provided by either an employee of a public district or through a contract by the district with an individual, association, agency, or organization. These employees, individuals, associations, agencies, or organizations must be independent of the private school and any religious organization in the provision of those services and such employment or contract must be under the control and supervision of the district.

Teachers and paraprofessionals who provide Title I services to private school participants and are employees of a district must meet the qualification requirements of NCLB.

A district may hire a private school teacher to provide Title I services to private school participants, as long as the private school teacher meets the highly qualified teacher standards required by NCLB and is independent of the private school in the provision of Title I services. The private school teacher can only be employed for Title I purposes outside of the time he or she is employed by the private school and the private school teacher must be under the direct supervision of the district with respect to all Title I activities.

Third part contractor providing services must be independent of the private school and of any religious organization in the provision of those services. The services may be provided in a private school under the same conditions, and subject to the same limitations, as if the district provided the services. If a district contracts with a third-party provider, the third-party provider need not employ Title I teachers and paraprofessionals that meet the qualification requirements of NCLB.

Paraprofessionals providing instructional support must work under the direct supervision of a public school teacher. A paraprofessional works under the direct supervision of a teacher if:

- (1) The teacher prepares the lessons and plans the instructional support activities that the paraprofessional carries out; and,
- (2) The paraprofessional works in close and frequent proximity to the teacher.
- (3) Title I-paid paraprofessionals may not work under the supervision of private school teachers.

A Title I program for private school participants staffed entirely by paraprofessionals is not permitted.

Title I funds may not be used to renovate the private school site.

Costs for computers and software are considered to be instructional costs and are paid from the funds allocated for instructional services for private school children.

### **Standards, Assessment and Program Modification**

Private school students who participate in Title I programs must be held to high standards. A district must annually assess the progress of the Title I program toward enabling private school Title I participants to meet agreed-upon standards. The district may use the State's assessment system or other assessment measures that more accurately reflect the progress of the private school participating students. Every year the district and private school officials must consult on what constitutes annual progress for the Title I program. If the Title I program for the private school participants does not make the expected annual progress, the LEA must annually make modifications to the Title I program.

The district should assess private school children in the subjects in which the district provides Title I services to those children. Title I funds may be used to assess private school children if the assessment is used only for Title I purposes.

Officials of the private schools may provide the district with the assessment data on Title I participants that the private school has collected as part of its testing program. However, private school officials are not obligated to do this, and refusal by private school officials to provide these data does not release the LEA from its obligation to provide services and assess the progress of the private school participants in the Title I program.

**Note:** An LEA may not pay a private school for the assessment data of Title I participants.

## **Frequently Asked Questions** **Title I-A Services to Private School Children**

1. ***Are districts responsible for contacting private schools located outside of the District boundaries to determine if students from the district are attending these private schools?***

No. Districts are only responsible for contacting private schools located within the district boundaries.

2. ***Are districts responsible for providing Title I-A services to eligible students that reside within the district boundaries and are attending a private school outside of the district boundaries?***

Yes. Students residing within the district boundaries generate federal funds received by the district to provide services to students based on census data. Eligible students are entitled to the services provided by federal funds even though they are attending a private school located outside of the district boundaries.

3. ***Who is responsible for making the district aware of students attending private schools outside the district boundaries?***

Private schools wishing to access federally funded services for their eligible students residing in a district whose boundaries do not encompass the location of the private school may contact the district in which the eligible student resides to request a consultation.

4. ***Who is responsible for verifying that students attending the private school reside within district boundaries?***

It is the responsibility of the private school to provide the district with documentation demonstrating that the student(s) reside within the district boundaries. Districts may verify the information before consulting with the private school for the provision of services.

5. ***How does a district verify that student(s) are eligible to generate funds for Title I-A services?***

The private school administration and the district consult to determine the criteria (*from the criteria listed in NCLB to determine poverty*) to be used in determining eligible students. It is the districts' decision what criteria and documentation is to be used to determine Title I-A eligibility. Many districts use Free and Reduced meal eligibility.

6. ***Are Title I-A services provided to the private school students generating the funds based on poverty criteria?***

Not necessarily. Title I-A services are provided to students failing, or at risk of failing, to meet high academic standards. As in a public school, students most at risk of failing are provided

Title I-A services, regardless of whether or not they have generated the funding.

**7. Are districts required to determine eligibility of students for all NCLB formula grants?**

No, only Title I-A has student eligibility requirements for determining services. All other federal formula grants have requirements for the provision of services to students attending private schools, but do not base participation or student eligibility criteria.

These questions and answers are an excerpt from the U.S. Department of Education non regulatory guidance [Title I Services to Eligible Private School Children](http://www.ed.gov/programs/titleiparta/parentinvguid.doc)  
<http://www.ed.gov/programs/titleiparta/parentinvguid.doc>

### **Private Schools and Set Asides (Reserves)**

If an LEA reserves funds off the top of its Title I allocation for district-wide instructional programs for public elementary and secondary school students, the equitable services requirement applies. If the district reserves funds for instructional and related activities for public elementary or secondary school students at the district level, the district must also provide from these funds equitable services to eligible private school children. The amount of funds must be proportional to the number of private school children from low-income families residing in participating public school attendance areas.

Set-Asides – ***These funds are deducted from the district Title A allocation before calculating funds available to schools and private schools***

#### **District Administration**

An LEA may reserve an amount to administer Title I programs for both public and private school children. Included in administration funds are special capital expense costs. These costs must be considered administrative costs and taken off the top of the LEA's total Title I allocation in the district administration set-aside.

Special capital expenses refer to expenditures for non-instructional goods and services that are incurred as a result of implementing alternative delivery systems such as the following:

- Purchase or lease of real and personal property;
- Insurance and maintenance costs;
- Transportation between a private school and another site;
- Buy-out leases for mobile vans or neutral space;
- Other comparable goods and services, which include costs to:
  - Escort children to and from instructional areas;
  - Computer-assisted instruction;
  - Costs to install equipment; and,
  - Pay for non-instructional computer technicians.

#### **Transportation**

If private school children eligible to receive equitable Title I services need to be transported from their private school to another site, the district is responsible for providing that transportation. The cost of such transportation is an administrative cost and should not be charged to the instructional funds allocated for private school children.

The extra costs of providing services at a location outside the private school is a set-aside.

#### **Furniture**

Title I funds may be used to purchase furniture for a private school Title I classroom if that cost is reasonable and necessary for the operation of the Title I program; the cost of the furniture must be charged to administrative costs. Only Title I participants may use it.

### **Parent Involvement**

Title IA requires districts to reserve funds for parental involvement activities. Parents of eligible private school children must be served using a portion of the parent involvement set-aside. The district uses the number private school students in each attendance area to calculate the percentage of the set-aside needed for parents of eligible private school students.

### **Examples of Parent Involvement Activities**

- During the consultation process, the LEA, private school officials and parents discuss a number of options for parental involvement in the Title I program, including parent meetings, parent compacts, parent-teacher conferences, parent training activities, and reasonable access to Title I staff. After considering the needs of the private school parents and the views of the private school officials and parents, the LEA conducts an annual meeting with parents, initiates written compacts between the LEA and parents outlining their shared responsibilities in the Title I program and provides workshops for parents on how to work at home with their children in reading and math. The LEA also provides parents of each private school participant an individual student report on the performance of that participant on the State assessment or on an appropriate alternative assessment and informs parents about how their children are achieving in the Title I program through monthly reports to parents.
- One LEA encourages and enhances parental involvement through hands-on workshops and individual meetings to provide parents with strategies and techniques for improving their children's learning. For example, a joint compact between the Title I teachers and the parents of participating students outlines their shared responsibilities for improved student achievement under Title I using books and tapes in a read-aloud program. A workshop is developed to teach parents how to find age appropriate books, and to teach them reading skills to increase enjoyment and outcome (e.g. using different voices, emphasizing letter-sound combinations, asking open-ended questions.) In addition, parents use a variety of teacher-made and commercially prepared activity kits, resource books, and guides to enhance their involvement in their children's education. Progress reports are distributed to parents twice a year, and a parent representative from each private school community is invited to the District-wide Private School Steering Committee to share ideas and recommendations regarding services to be implemented for private school participants, their teachers, and their families.

**Above Examples from Title I Services to Eligible Private School Children U.S. Dept of Education Non Regulatory Guidance**

### **Professional Development**

- The district must provide equitable services to teachers of private school participants from this set-aside. A district calculates these equitable services from the set-asides in proportion to the number of private school children from low-income families residing in participating public school attendance areas.
- Title I teachers employed by the district and assigned to private schools are provided professional development in the same way as all district employees.

- The professional development activities for private school teachers should address how those teachers can serve Title I students better. It is inappropriate to use these funds to upgrade the instructional program in the regular classroom of the private school.
- Private school officials are not authorized to obligate or receive Title I funds. The statute clearly states that the District must maintain control of Title I funds. No Title I funds may be paid to the private school.
- Stipends for private school teachers must be available on the same basis as public school teachers *and* the stipends must be paid directly to the private school teachers for their own use and not to the private school.
- Title I funds may not be used to hire substitute private school teachers.

### **Extended Time**

Title I summer school programs provide instructional services requiring the district to provide equitable services to eligible private school children. The district must base equitable services supported with the set-aside funds on the proportion of private school children from low-income families residing in participating public school attendance areas.

### **Preschool**

The equitable services requirement applies only to children who attend private elementary and secondary schools and does not apply to children attending private preschool programs.

### **School Improvement Set-asides – Supplemental Educational Services**

Private school children who receive Title I services are not eligible to receive supplemental educational services. Only children from low-income families attending public schools identified for improvement, corrective action, and restructuring are eligible to receive supplemental educational services.

### **Transferring funds**

Any funds transferred into the Title I program from other ESEA programs under the transferability authority, are subject to equitable participation of private school students. A district may not transfer funds into the Title I program solely to provide services for private school students.

### **Options for using funds for instructional services to private school participants**

The district and private school officials may choose one or both of the following options for using the funds reserved for instructional services for eligible private school children.

- On a school-by-school basis
- Pooling option: Combine funds allocated for private school children in all participating areas to create a pool of funds from which the district provides equitable services to eligible private school children.

If there are no children from low-income families attending a private school, private school children who meet the educational criteria may not obtain Title I services unless the district chooses to pool the funding.

**Sample Letters and Forms for Use with Private Schools**  
***Sample Initial Letter to Private Schools***

Dear (*Private School Official*),

As you may be aware, the federal education legislation, the *Elementary and Secondary Schools Act of 1965*, was reauthorized on January 8, 2002 under the title *No Child Left Behind*. As in the previous authorization, students attending nonprofit private schools are eligible to receive services provided by this legislation.

Students living within public school district boundaries are eligible to be served by Title IA, Title IC, Title II A & B, Title II D, Title III, Title IV A & B and Title V A equitably with public school students.

In order for the students attending a private school to be served by this federal legislation, the private school officials must meet with district personnel to determine the nature of the services and how those services will be delivered.

Our timeline for applying for federal funds is very short this year. We are required to submit an initial application for funding by May 15, 200\_. In order to meet this timeline we would like to schedule a meeting with you as soon as possible. We would like to meet with you on DATE, TIME, PLACE, to discuss the items on the enclosed agenda.

If you do not wish to arrange for services for your eligible students, please inform us, in writing, that you will not be participating in federal Title programs in the \_\_\_\_\_ school year. Please understand that if we do not receive a response from you by DATE we will assume you do not wish to participate.

Enclosed is a brief description of each federal Title program. Please consider the agenda items and programs carefully then let us know if you will be participating on behalf of your eligible students.

Sincerely,



**AFFIRMATION OF CONSULTATION  
WITH PRIVATE SCHOOL OFFICIALS**

SAMPLE FORM for USE by LEAs \*

Section 1120(b) of the No Child Left Behind Act and §200.63 of the Title I regulations require that timely and meaningful consultation occur between the local education agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs under this Act, and shall continue throughout the implementation and assessment of activities under this section.

**The following topics must be discussed during the ongoing consultation process:**

- How the LEA will identify the needs of eligible private school children.
- What services the LEA will offer to eligible private school children.
- How and when the LEA will make decisions about the delivery of services.
- How, where and by whom the LEA will provide services to eligible private school children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with a third-party provider.
- How the LEA will assess academically the services to eligible private school children in accordance with §200.10 and how the LEA will use the results of that assessment to improve Title I services.
- The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with §200.64, the proportion of funds that will be allocated to provide these services.
- The method or sources of data that the LEA will use under §200.78 to determine the number of private school children from low income families residing in participating public school attendance areas, including whether the LEA will extrapolate data, if a survey is used.
- The equitable services the LEA will provide to teachers and families of participating private school children.
- If the LEA disagrees with the views of the private school officials on the provisions of services through a contract, the LEA must provide the private schools the reasons in writing why the LEA chooses not to use a contractor.

**We agree that timely and meaningful consultation occurred before the LEA made any decision that affected the participation of eligible private school children in the Title I, Part A program.**

\_\_\_\_\_  
Public School Official                      Date

\_\_\_\_\_  
Private School Representative                      Date

\_\_\_\_\_  
School District

\_\_\_\_\_  
Name of Private School Agency or School

**The LEA must maintain a copy of this form in its records and provide a copy to the SEA.**

\*This is not an official Department of Education document. It is provided only as an example.

**SURVEY FORM**

**LEA SAMPLE FORM for Use by Private School Officials\***

The purpose of this survey is to collect data that will be used to determine the amount of funds available for the public school district to provide Title I services to eligible students in our school. Determining the number of our students, by public school district of residence, who would qualify for free and reduced-price lunches, accomplishes this. The information requested below is confidential. It is not necessary to provide family names.

**A.** Find your family size and look at the annual gross income level listed beside it on the chart printed below.

Family Size	Annual Gross Income For 2002-2003
One	\$15,244
Two	\$20,461
Three	\$25,678
Four	\$30,895
Five	\$36,112
Six	\$41,329
Seven	\$46,546
Eight	\$51,763

- For each additional family member over eight, add \$5,032 to your Annual Gross Income.
- If you are paid on a weekly or monthly basis, please multiply that amount by the number of weeks or months actually worked each year to determine your "Annual Gross Income."

**B.** Is your family income less than the amount on the chart on the line \_\_\_\_\_yes  
beside your family size? \_\_\_\_\_no

**C.** Is your family eligible for food stamps? \_\_\_\_\_yes  
\_\_\_\_\_no

**D.** Are you receiving Temporary Assistance to Needy Families (TANF) \_\_\_\_\_yes  
Assistance? \_\_\_\_\_no  
(Formerly AFDC or Public Assistance)

**E.** Please provide the following information:

Address: \_\_\_\_\_  
\_\_\_\_\_

Public school district in which you reside: \_\_\_\_\_

Grade levels of your children: \_\_\_\_\_

\*This is not an official Department of Education document. It is provided only as an example.

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**INCOME ELIGIBILITY FORM**

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**SAMPLE FORM for Private School Officials to Submit to LEAs\***

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**Private School Students Living in Poverty**

Please use one form for each public school district. Duplicate as necessary.

**Name of Non-Public School** \_\_\_\_\_

**Public School District** \_\_\_\_\_

Please provide below the grades and geographic information verifying residence in a participating public school attendance area of those families that meet the poverty criteria of \_\_\_\_\_ [insert here the poverty criteria used—e.g., U.S. Department of Agriculture for the free and reduced price lunch program]. Do not provide the names of the families or students.

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<b>Grades</b>	<b>Geographic Information</b>

\* This is not an official Department of Education document. It is provided only as an example

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# Oregon Title I Handbook

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## **CH. 11 PROFESSIONAL DEVELOPMENT**

Recognizing that intensive and sustained professional development for teachers and other school staff to help all children attain high standards has too often been lacking, section 1119 of the No Child Left Behind Act states that each educational agency receiving assistance under Title I-A “shall provide high quality professional development that will improve the teaching of academic subjects, consistent with the State content standards, in order to enable all children to meet the State’s student performance standards.”

This provision in the law requires that all staff, including paraprofessionals who work directly with students receiving services in Title IA targeted assistance programs or who are staff members in Title IA schoolwide programs must be provided with appropriate staff development opportunities. Title IA or other funds may be used for this purpose. Regardless of the funding source, providing “high-quality” professional development opportunities for licensed and non-licensed staff is a responsibility of districts receiving Title IA funds.

All school staff in a schoolwide program should participate in professional development activities. All school staff in targeted assistance schools may participate in professional development activities funded by Title I if participation will result in better addressing the needs of students served. Parents may also participate in professional development activities in Title I served schools if the school determines that parental participation is appropriate.

Effective teacher professional development is more than just coursework designed to fill a state or district requirement. It is a set of activities that produce a demonstrable and measurable effect on student academic achievement. The ESEA emphasizes that effective professional development must be grounded in scientifically based research [*Title IX, Section 9101(34)*]. Effective professional development works best when it is part of a system-wide effort to improve and integrate teacher quality at all stages: preparation, induction, support, and ongoing development.

Professional Development includes activities that:

1. Improve and increase teachers' knowledge of the academic subjects they teach, and enable teachers to become highly qualified;
2. Are an integral part of broad schoolwide and district-wide educational improvement plans;
3. Give teachers, principals, and administrators the knowledge and skills to provide students with the opportunity to meet challenging State academic content standards and student academic achievement standards;
4. Improve classroom management skills;
5. Are high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom and **are not 1-day or short-term workshops or conferences**;

6. Support the recruiting, hiring, and training of highly qualified teachers, including teachers who became highly qualified through state and local alternative routes to certification;
7. Advance teacher understanding of effective instructional strategies that are:
  - a. Based on scientifically based research (except that this subclause shall not apply to activities carried out under Part D of Title II); and
  - b. Strategies for improving student academic achievement or substantially increasing the knowledge and teaching skills of teachers; and
8. Are aligned with and directly related to:
  - a. State academic content standards, student academic achievement standards, and assessments; and
  - b. The curricula and programs tied to the standards described in sub clause (a) [except that this sub clause shall not apply to activities described in clauses (ii) and (iii) of Section 2123(3)(B)];
9. Are developed with extensive participation of teachers, principals, parents, and administrators of schools to be served under this Act;
10. Are designed to give teachers of limited English proficient children, and other teachers and instructional staff, the knowledge and skills to provide instruction and appropriate language and academic support services to those children, including the appropriate use of curricula and assessments;
11. To the extent appropriate, provide training for teachers and principals in the use of technology so that technology and technology applications are effectively used in the classroom to improve teaching and learning in the curricula and core academic subjects in which the teachers teach;
12. As a whole, are regularly evaluated for their impact on increased teacher effectiveness and improved student academic achievement, with the findings of the evaluations used to improve the quality of professional development;
13. Provide instruction in methods of teaching children with special needs;
14. Include instruction in the use of data and assessments to inform and instruct classroom practice;
15. Include instruction in ways that teachers, principals, pupil services personnel, and school administrators may work more effectively with parents;
16. May include activities that:
  - a. Involve the forming of partnerships with institutions of higher education to establish school-based teacher training programs that provide prospective teachers and beginning teachers with an opportunity to work under the guidance of experienced teachers and college faculty;

- b. Create programs to enable paraprofessionals (assisting teachers employed by a local educational agency receiving assistance under Part A of Title I) to obtain the education necessary for those paraprofessionals to become certified and licensed teachers; and/or
17. Provide follow-up training to teachers who have participated in activities described in subparagraph (A) or another clause of this subparagraph that is designed to ensure that the knowledge and skills learned by the teachers are implemented in the classroom [Title IX, Part A, Section 9101(34)]

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# Oregon Title I Handbook

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## **CH. 12 HIGHLY QUALIFIED STAFF**

### **Highly Qualified Teachers**

NCLB, Title I Part A, Sections 1114, 1115 and 1119, requires that all teachers teaching in core content areas must meet the NCLB definition of Highly Qualified by the end of the 2005-06 school year. In Oregon, the Teacher Standards and Practices Commission (TSPC) provides licensure for all teachers and administrators. Refer to TSPC regulations for specific requirements at 503-378-3586 or <http://www.tspc.state.or.us/>

To be deemed highly qualified, teachers must have: 1) a bachelor's degree, 2) full state certification or licensure, and 3) prove that they know each subject they teach. Teachers (in middle and high school) must prove that they know the subject they teach with:

- 1) a major in the subject they teach, or
- 2) credits equivalent to a major in the subject, or
- 3) passage of a state-developed test, or
- 4) High Objective Uniform State Standards of Evaluation (HOUSSE). This is for current teachers only, see following page for additional information regarding HOUSSE., or
- 5) an advanced certification from the state, or
- 6) a graduate degree.

NCLB requires states to 1) measure the extent to which all students have highly qualified teachers, particularly minority and disadvantaged students, 2) adopt goals and plans to ensure all teachers are highly qualified, and 3) publicly report plans and progress in meeting teacher qualification goals.

NCLB allows states to develop an additional way for current teachers to demonstrate subject-matter competency and meet highly qualified teacher requirements. Proof may consist of a combination of teaching experience, professional development, and knowledge in the subject garnered over time in the profession.

### **New Flexibility**

The U.S. Department of Education has provided three new areas of flexibility for teachers to demonstrate that they are highly qualified. This flexibility will benefit teachers, local and state administrators, and most importantly--students

#### **I. Rural Teachers**

Approximately one-third--or almost 5,000--of all school districts in the United States are considered rural. Often, the teachers in these areas are required to teach more than one academic subject. This new flexibility is designed to recognize this challenge and provide additional time for these teachers to prove that they are highly qualified.

- Under this new policy, teachers in eligible, rural districts who are highly qualified in at least one subject will have three years to become highly qualified in the additional subjects they teach. They must also be provided professional development, intense supervision or structured mentoring to become highly qualified in those additional subjects.

## II. Science Teachers

Science teachers, like rural teachers, are often needed to teach in more than one field of science. Some states allow such science teachers to be certified under a general science certification, while others require a subject-specific certification (such as physics, biology or chemistry). In science, where demand for teachers is so high, the Department is issuing additional flexibility for teachers to demonstrate that they are highly qualified.

- States may, based on their current certification requirements, allow science teachers to demonstrate that they are highly qualified either in "broad field" science or individual fields of science (such as physics, biology or chemistry).

## III. Current Multi-subject Teachers

Current teachers do not have to return to school or take a test in every subject to demonstrate that they meet highly qualified requirements. *No Child Left Behind* allows states to create an alternative method (High, Objective, Uniform State Standard of Evaluation or HOUSSE) for teachers not new to the field--as determined by each state--to certify they know the subject they teach. But, for multi-subject teachers, this alternate process could become unnecessarily protracted and repetitive as they go through the HOUSSE process for each subject.

- Under the new guidelines, states may streamline this evaluation process by developing a method for current, multi-subject teachers to demonstrate through one process that they are highly qualified in each of their subjects and maintain the same high standards in subject matter mastery.

## Existing Flexibility

### I. HOUSSE for Current Teachers

***No Child Left Behind* does not require current teachers to return to school or get a degree in every subject they teach to demonstrate that they are highly qualified.**

The law allows states to provide an alternate method (HOUSSE) for experienced teachers to demonstrate subject-matter competency that recognizes, among other things, the experience, expertise, and professional training garnered over time in the profession.

### II. Middle School Teacher Requirements

States have the authority to define which grades constitute elementary and middle school. States may determine, by reviewing the degree of technicality of the subject matter being taught and the rigor of knowledge needed by the teacher, whether demonstrating competency as an elementary or as a middle school teacher is



appropriate. In addition, states may approve rigorous content-area assessments that are developed specifically for middle school teachers aligned with middle school content and academic standards.

**III. Testing Flexibility**

*NCLB* provides flexibility in developing assessments for teachers to demonstrate subject-matter competency. States may tailor teacher tests to the subjects and level of knowledge needed for effective instruction.

**IV. Special Education Teachers**

The highly qualified teacher requirements apply only to teachers providing direct instruction in core academic subjects. Special educators who do not directly instruct students in core academic subjects or who provide only consultation to highly qualified teachers in adapting curricula, using behavioral supports and interventions, or selecting appropriate accommodations, do not need to demonstrate subject-matter competency in those subjects.

Congress, in the context of the Individuals with Disabilities Education Act (IDEA) reauthorization, is considering modifying how the highly qualified teacher provisions of *NCLB* apply to special education teachers. The Department looks forward to working with Congress in addressing this need.

The information regarding flexibility in meeting highly qualified requirements is from the *NCLB Flexibility: Highly Qualified Teachers Fact Sheet* from the U.S. Department of Education. <http://www.ed.gov/nclb/methods/teachers/hqtflexibility.pdf>

In the event that a teacher in a core content area is not “highly qualified” parent notification is required. Title I, Part A schools must give each parent timely notice when their child has been assigned, or has been taught for four or more consecutive weeks, by a teacher who is not highly qualified. *NCLB* Section 1111(h)(6)(B)(ii).

## **Highly Qualified Paraprofessionals**

### **Section 1119 of No Child Left Behind**

#### **Qualification Requirements for Title I Paraprofessionals:**

Title I paraprofessionals must have the appropriate knowledge and ability to assist in instructing students and be competent in required instructional techniques and academic content areas. They must also demonstrate that they are competent in basic literacy skills, including the ability to speak and write standard English.

All Title I paraprofessionals must have a secondary school diploma or its recognized equivalent.

Additionally, except as noted below, paraprofessionals hired after January 8, 2002, and working in a program supported with Title I, Part A funds must have:

- Completed two years of study at an institution of higher education; or
- Obtained an associate's (or higher) degree; or
- Met a rigorous standard of quality and be able to demonstrate, through a local academic assessment, knowledge of and the ability to assist in instructing, reading, writing, and mathematics (or, as appropriate, reading readiness, writing readiness, and mathematics readiness).

Paraprofessionals hired on or before January 8, 2002, and working in a program supported with Title I, Part A funds must meet these requirements by January 8, 2006.

Paraprofessionals who serve as translators or who conduct parental involvement activities must have a secondary school diploma or its equivalent but do not have to meet the additional requirements.

The requirements apply to all paraprofessionals in a Title I schoolwide program, without regard to whether the position is funded with Federal, State, or local funds.

The requirements apply to all paraprofessionals who are paid with Title I, Part A funds in a targeted assistance program.

“Two years of study” means the equivalent of two years of full-time study, as defined by the institution of higher education. A specific course of study is not required.

An LEA must use not less than five percent of its Title I allocation for professional development activities to ensure that teachers and paraprofessionals meet the qualification requirements, including paying for the paraprofessional assessment. Those funds may be combined with funds provided under Title II, other Acts, and other sources. LEAs also may use their general Title I funds to support ongoing training and professional development to assist teachers and paraprofessionals.

### **Assessments for Paraprofessionals:**

There must be evidence that the assessment is valid and reliable. The content of the assessment should reflect both Oregon's academic standards and skills of a student at a given school level and the ability of the candidate to effectively provide instructional support to assist students in mastering the content. The assessment could be a combination of a written test on content and a demonstration of competence in instruction.

The assessment should be rigorous and objective, with a standard that each candidate is expected to meet or exceed. The standards for evaluation must be applied to each candidate in the same way. The assessment results should be documented with a record of the assessment and the individual's performance on that assessment. The LEA should retain that documentation.

**For a paraprofessional hired after January 8, 2002**, the assessment must be administered and passed **before** an individual is hired to work as a Title I paraprofessional.

### **Responsibilities of Paraprofessionals:**

A paraprofessional may be assigned to:

- Provide one-on-one tutoring for eligible students, if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher;
- Assist with classroom management, such as organizing instructional materials;
- Provide instructional assistance in a computer laboratory;
- Conduct parental involvement activities;
- Provide support in a library or media center;
- Act as a translator; or
- Provide instructional services to students under the direct supervision of a highly qualified teacher.

Because paraprofessionals provide instructional support, they should not be providing planned direct instruction, or introducing to students new skills, concepts, or academic content.

A paraprofessional may be assigned duties outside of classroom instruction for participating students, as long as the amount of time is proportional to the time similar personnel at the same school spend on similar duties.

### **Supervision of Paraprofessionals:**

Paraprofessionals may not provide any instructional service to a student unless the paraprofessional is working under the direct supervision of a highly qualified teacher. A paraprofessional works under direct supervision if:

- The teacher prepares the lessons and plans the instructional support activities the paraprofessional carries out, and evaluates the achievement of the students with whom the paraprofessional is working; and
- The paraprofessional works in close and frequent proximity with the teacher.

The following programs **are not acceptable** because a paraprofessional is not under direct supervision of a teacher and/or in close and frequent proximity:

- A program staffed entirely by paraprofessionals,
- A program where a paraprofessional provides instructional support and a teacher visits a site once or twice a week, or
- A program where a paraprofessional works with a group of students in another location while the teacher provides instruction to the rest of the class.

### **Verification of Compliance:**

Each LEA, at a minimum, shall require that the principal of each school operating a schoolwide or targeted assistance program attest in writing as to whether such school is in compliance with the requirements of section 1119. Copies of attestations are to be maintained at each school and at the main office of the LEA and shall be available to any member of the general public on request.

## **TIME AND EFFORT**

This requirement relates to the allowable use of federal funds to support employee salaries. In order to charge the salary or wages of an employee to a federal program the district must show that the employee worked on that specific federal program or “code objective”. Time and Effort records must be maintained in certain circumstances by certain employees.

When in doubt about the degree of detail expected in time and effort record keeping, check with your local auditor.

### **Key Points:**

- Schoolwide Programs are exempt from time and effort record keeping.
- Split-funded staff ( paid in part by Title IA and in part by other sources) who are working in targeted assistance schools are required to keep time distribution records. District policy for record keeping may vary. Follow district policy.
- A principal who is also the Title I Coordinator or Federal Programs coordinator for the district and whose salary is split funded (LEA funds and Title IA funds) would need to keep Time and Effort records.
- At the district level, consolidated administrative funds are considered a single federal program or cost objective. Employees need not distinguish time spent on individual covered programs. Refer to Office of Management and Budget (OMB) Circular A-87 [http://www.whitehouse.gov/omb/circulars/a087/a87\\_2004.html](http://www.whitehouse.gov/omb/circulars/a087/a87_2004.html)  
Until IASA a district employee working on multiple federal programs, would have had to record how much time was spent on each given program. This changed in 1994 when the opportunities for flexibility was increased not only in allowing consolidated planning but also increased fiscal flexibility to combine federal funds from various federal programs and use them to administer the programs as a whole. Coordinators are no longer required to maintain separate accounts of time spent on various federal programs but rather can attribute the cost to consolidated program administration.

The following are recommendations regarding district policy:

- Split-funded staff with regular schedules (every day, Title I hours are the same) may file a schedule and a signed quarterly statement of verification.
- Split-funded staff with varied duties (administrators with responsibilities other than Title I, teachers with responsibilities for Title I and special education students) must keep detailed time and effort records. Filing these monthly is preferable, but quarterly is acceptable. Funds must be reconciled annually should there be any variation between payment on the partial FTE assignment and the actual time spent with Title I duties.

## **NON-INSTRUCTIONAL DUTY TIME**

Staff members paid with Title I funds may participate in duties not directly related to instruction in the core academic areas. “Duty time” is not an issue in Schoolwide Programs when funds are commingled for staffing purposes. There are limits, however, to the amount of time Title I staff in targeted assistance schools may engage in non-instructional duties (for example, playground, cafeteria, detention).

NCLB, Title I, Part A Section 1114 limits that time to the amount spent by “similarly situated staff” paid from regular education funds. When there are no “similarly situated staff” with which to make association, it is recommended that schools restrict the use of Title funded personnel from these activities. These are district responsibilities and, except in the case of doing their fair share, any time a Title I staff member performs duties for which approval was not given in the Sub-grant Application, the district is open to the compliance issue of supplanting.

Any non-instructional duty time assigned to full time or part time staff that are paid in part by Title I funds and in part by non-federal funds must occur only during the portion of the week day paid by non-federal funds. Part-time staff paid in full by Title I funds may be assigned non-instructional duty time as long as that time does not exceed the amount assigned to similarly situated staff as described above.

Title IA funds in targeted assistance schools may not be used to support regular education responsibilities such as using Title I staff to substitute teach in the absence of a classroom teacher, writing special education IEPs, or assigning Title I funded staff as media specialists or cafeteria personnel. These general aid positions may not be supported by Title I funds in Targeted Assistance buildings.

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# Oregon Title I Handbook

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## **CH. 13 ACCOUNTABILITY AND SCHOOL IMPROVEMENT**

### **Districts in District Improvement**

#### **Title I Requirements for Districts Identified for District Improvement**

##### Local Educational Agency Improvement Plans

The Oregon Department of Education must annually review the progress of each local educational agency (LEA) in the state that receives funds under Title I, Part A. If the State determines that the LEA has not made adequate progress for two consecutive years, it must identify the LEA for improvement.

If an LEA is identified it must develop or revise an improvement plan, no later than three months after the identification. In developing or revising this plan, the LEA must consult with parents, school staff and others. The purpose of the LEA plan is to *improve student achievement* throughout the LEA. Therefore, the plan overall must identify actions that, if implemented, have the greatest likelihood of accomplishing this goal. The plan will address the responsibilities of the LEA with respect to school improvement, technical assistance, parent involvement, and professional development.

The improvement plan must analyze and address leadership for schools, governance and fiscal infrastructures, and curriculum and instruction. The process of writing the plan should result in a determination of why the LEA's previous efforts to improve were ineffective and a framework of detailed action steps to improve on those efforts.

##### **Leadership for Schools**

- Define specific measurable achievement goals and targets for each of the student subgroups whose disaggregated results are included in the State's definition of AYP;
- Include strategies to promote effective parental involvement in the schools served by the LEA.

##### **Governance and Fiscal Infrastructures**

- Specify the LEA's responsibilities under section 1120A (Fiscal Requirements), which includes maintenance of effort, federal funds to supplement, comparability of services and exclusion of funds;
- The LEA must reserve not less than 10% of its Title I Part A funds for high-quality professional development for instructional staff that is specifically designed to improve classroom teaching. The LEA must continue to reserve and use these funds for this purpose during each fiscal year it is identified for improvement. The LEA may include in this 10% total the Title I Part A funds that schools within the LEA reserve for professional development when they are in school improvement. However, the LEA may not include in the total any part of the funds designed to help teachers who are not highly qualified become highly qualified;
- Specify the technical assistance to be provided by the Oregon Department of Education.

##### **Curriculum and Instruction**

- Address the fundamental teaching and learning needs of schools in the LEA, especially the academic problems of low-achieving students;
- Identify actions that have the greatest likelihood of improving the achievement of participating students in meeting the State’s student academic achievement standards;
- Incorporate strategies grounded in scientifically based research that will strengthen instruction in core academic subjects;
- Include, as appropriate, student learning activities before school, after school, during the summer, and during any extension of the school year;
- Provide for high-quality professional development for instructional staff that is specifically designed to improve classroom teaching.

The LEA must implement its improvement plan, whether new or revised, during the school year in which the LEA enters improvement status.

#### Responsibilities of the ODE to Assist With LEA Improvement Plans

The plan must also detail the required technical assistance the ODE will provide. If requested, the ODE should help the LEA to:

- Develop and implement the plan;
- Work with schools identified for improvement; and
- Address problems with implementing parental involvement measures and providing high-quality professional development.

The technical assistance must apply effective methods and instructional strategies grounded in scientifically based research.

[http://www.ode.state.or.us/opportunities/grants/nclb/title\\_1/a\\_basicprograms/schoolimprovement/schimpresmanualrev904.doc](http://www.ode.state.or.us/opportunities/grants/nclb/title_1/a_basicprograms/schoolimprovement/schimpresmanualrev904.doc)

## **Title I-A Schools in School Improvement Status**

### **Accountability for Title I Schools**

Title I schools that do not meet AYP for one year are not required to implement mandatory federal consequences of school choice or supplemental service (described below). However, the district is required to provide assurance to the Oregon Department of Education that all federal requirements for implementation of the various provisions of *No Child Left Behind Act* are in place. The district will be expected to revise its description of how it will use its federal funds to target the needs of the school or district identified in the AYP analysis. The Oregon Department of Education will monitor program compliance.

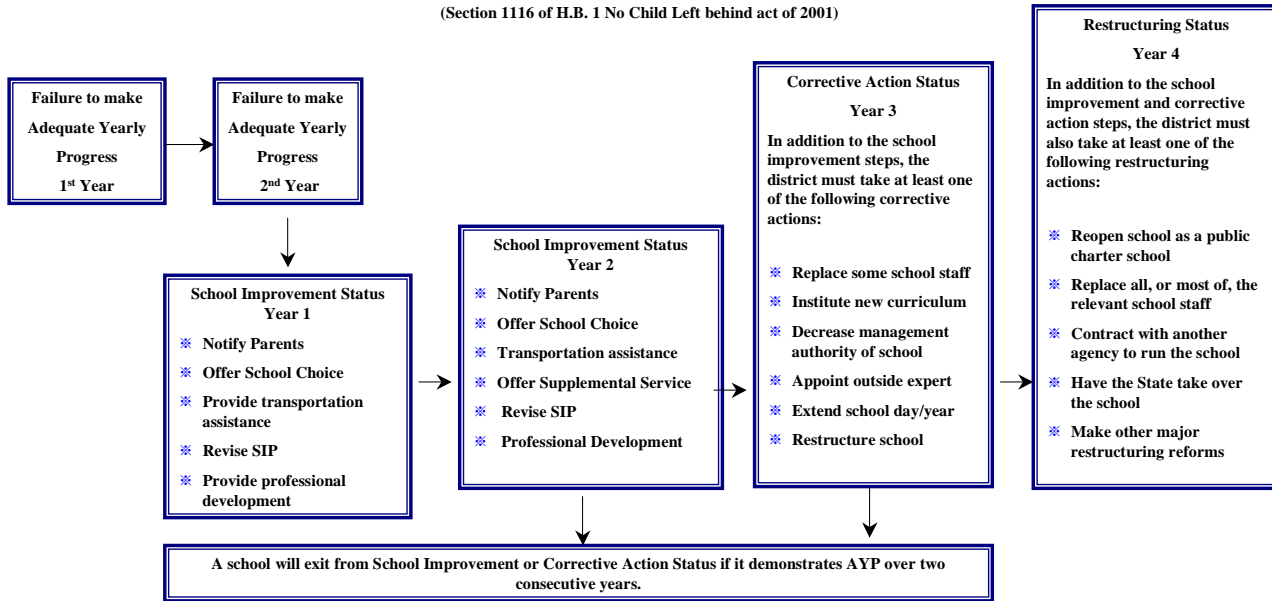
The Oregon Department of Education is required by the U.S. Department of Education to establish targets for expected rates of growth for every school in order to close the achievement gap. The Oregon Department of Education will work in partnership with key partners such as ESDs, universities, community-based organizations, and professional organizations to provide technical assistance and support to districts and schools. This shared accountability among the education community will utilize a “capacity building” process that leads to better understanding of the nature of student achievement in the districts, analysis of effective strategies, and

development of plans that will lead to student success. The expected outcome is a deeper organizational understanding of how to improve student achievement.

Under NCLB, schools and districts that are designated as *not meeting AYP* in the first year face no sanctions; however, sanctions begin at the end of the second year for Title I schools that are designated as *not meeting AYP* for the second consecutive year in the same area (i.e. English/Language Arts, Mathematics, Other Indicator). Consequences outlined in NCLB for Title I schools increase in severity each year as shown in the diagram below.

**FLOW CHART FOR ADEQUATE YEARLY PROGRESS & SCHOOL IMPROVEMENT**

(Section 1116 of H.B. 1 No Child Left behind act of 2001)



Please note. If a Title I school identified for sanctions meets AYP the following year, then the school stays at the sanction levels for the previous year.

**Funding Issues for Districts with Schools in Improvement Status**

District with a school or schools in Title I School Improvement has certain pre-determined funding requirements.

**Professional Development**

The district must provide an assurance that each school in improvement status will spend not less than 10 percent of the Title IA funds made available to the school for professional development, for each fiscal year that the school is in improvement status. These professional development funds are for the purpose of providing the school’s teachers and principal high-quality professional development. For more information, refer to the LEA and School Improvement Non-Regulatory Guidance from the U.S. Department of Education at

<http://www.ed.gov/policy/elsec/guid/schoolimprovementguid.doc>



## **Revision of School Improvement Plan**

The school must develop, with the direct assistance of the district, a required two-year plan that addresses the academic issues that caused it to be identified for school improvement. The school may develop a new plan or revise an existing one, but in either case it must be completed no later than three months after the school has been identified

### **Components of the Revised School Improvement Plan**

Together, the components of the school improvement plan should embody a design that is comprehensive, highly structured, specific, and focused primarily on the school's instructional program. Specifically, the plan must address:

1. Core academic subjects and the strategies used to teach them
2. Professional development for teachers, principals, and other school staff
3. Technical assistance to be provided to the school
4. Parent Involvement
5. Measurable Goals and Indicators

For specific examples of each component of the plan, refer to the *LEA and School Improvement Guidance, Section C* from the U.S. Department of Education at <http://www.ed.gov/policy/elsec/guid/schoolimprovementguid.doc>

### **Technical Assistance in Developing the School Improvement Plan**

In developing or revising its plan, the school must consult with parents, school staff, the district, and outside experts. Ideally, these outside experts will serve as technical assistants and partners with the school throughout the plan's implementation.

### **Process for Reviewing the School Improvement Plan**

The district must establish a process for reviewing school improvement plans, and include "peer reviewers" in the process. The district should involve as peer reviewers teachers and administrators from schools or districts similar to the one in improvement, but significantly more successful in meeting the learning needs of their students. Staff with demonstrated effectiveness and recognized expertise in school improvement will be able to evaluate the plan's quality, assess the likelihood of its successful implementation, and make suggestions for revisions.

### **Timeline for Review and Approval of the Plan**

Peer reviewers must review a proposed plan for school improvement within 45 days of its submission to the district. Once the peer review of the plan has been completed, the district must work with the school to make any necessary revisions and must approve

the plan as soon as it satisfactorily meets the requirements detailed in the statute and regulations.

### **Conditional Approval**

The district may approve the school improvement plan with conditions it deems necessary to ensure the plan's successful implementation. For example, the district may condition its approval on feedback from parents and community leaders. The district may also choose to approve the plan on the condition that the school makes significant changes, such as implementing a new curriculum with appropriate professional development, changing the internal organization of the school, or decreasing the school-level management authority.

#### ***Plan Implementation***

*The school must implement its new or revised school improvement plan as soon as the LEA approves it.*

#### ***School Improvement Grants to Support Implementation of the Plan***

All districts with schools in school improvement status will receive notification that they may apply for funds to provide support to these schools as they implement the school improvement plan. Notification will be sent to superintendents of eligible districts by September 16, 2004, or as soon as possible following that date. The amount of each grant will depend upon the number of schools in school improvement and the size of each school, and will be announced when the Request for Proposals (RFP) is released.

### **Requirement for Districts to Provide Technical Assistance to Schools in School Improvement Status**

NCLB requires that districts ensure that schools in school improvement status receive technical assistance as they develop or revise their school improvement plans, and throughout the implementation of that plan. Technical assistance is practical advice offered by an expert source that addresses specific areas for improvement. The district is not required to provide the technical assistance directly, although it may choose to do so. Other acceptable technical assistance providers include ODE staff, an institution of higher education, a private not-for-profit or for-profit organization, an ESD or another entity with experience in helping schools improve academic achievement.

Technical assistance for a school identified for improvement must focus on strengthening and improving the school's instructional program. It must help the school address the issues that caused it to not make AYP for two consecutive years. Specifically, the district must ensure that the school in need of improvement receives technical assistance based on scientifically based research in three areas:

1. **Data analysis:** The district must help the school to analyze results from the state assessment system and other relevant examples of student work. The district must teach school staff how to use data to identify and solve problems in instruction, to strengthen parental involvement and professional development, and to fulfill other responsibilities that are defined in the school improvement plan.

2. Identification and implementation of strategies: The district must help the school choose effective instructional strategies and methods and ensure that the school staff receives high quality professional development relevant to their implementation. The chosen strategies must be grounded in scientifically based research and address the specific instructional issues that caused the school to be identified for improvement.
3. Budget analysis: Reallocating resources to support improved student achievement is crucial to the successful implementation of the initiatives contained in NCLB. The district must provide the school in improvement with technical assistance in analyzing and revising its budget to fund activities most likely to increase student achievement and remove it from school improvement status.

For more information about providing technical assistance to schools, refer to *LEA and School Improvement Non-Regulatory Guidance, Section D* from the U.S Department of Education at <http://www.ed.gov/policy/elsec/guid/schoolimprovementguid.doc>

### Resources

1. Additional information about AYP and NCLB can be found at the Oregon Department of Education's website: <http://www.ode.state.or.us/search/results/?id=263> Information includes links to federal guidance, Oregon's Accountability Workbook, the AYP Policy and Technical Manual, sample reports, and other links.
2. **A Toolkit For Communicating About Adequate Yearly Progress** produced by the Oregon School Boards Association provides educational professionals, administrators, parents, and communities with relevant and reliable information regarding federal AYP requirements, details on how AYP relates specifically to Oregon's schools, and how to communicate school building results to a variety of audiences. The free toolkit can be downloaded at <http://www.osba.org>

## **School Choice**

### **Parental Notification Requirements**

Schools that are identified for school improvement and their districts have an obligation to provide parents with information about AYP and improvement efforts. A district shall provide written notification to parents of each student enrolled in a school identified for school improvement, corrective action, or restructuring. To the extent practicable, the notification must be in a language the parents can understand and must include the following:

2. An explanation of what the identification means, and how the school compares in terms of academic achievement to other elementary schools or secondary schools served by the district and the State;
3. Reasons for the identification;
4. An explanation of what the school identified for school improvement is doing to address the problem of low achievement;
5. An explanation of what the district or State educational agency is doing to help the school address the achievement problem;
6. An explanation of how the parents can become involved in addressing the academic issues that caused the school to be identified for school improvement; and
7. An explanation of the parents' option to transfer their child to another public school, or to obtain supplemental educational services for their student, at district expense.

### **Sample Parent Notification Letters**

The following letters are samples that districts may wish to use or adapt to their needs. The sample letters include three possible situations a district may encounter:

- **Transfer Option Available:** This sample letter is for a school in the first year of school improvement where a transfer option is available.
- **Transfer Option Not Available:** This sample letter is for a school in the first year of school improvement where a transfer option is not available. See Public School Choice Guidance at <http://www.ed.gov/policy/elsec/guid/schoolchoiceguid.doc> for explanation of acceptable reasons why no transfer option is available.

- Transfer Option or Supplemental Services Available—This sample letter is for a school in the second year of school improvement where a transfer option or supplemental educational services are available.

Sample Parent Notification Letter—Transfer Option Available

Sample Letter

Dear Parents or Guardian,

The No Child Left Behind Act requires that schools be evaluated each year to determine if they are making adequate yearly progress (AYP). This evaluation is based on the number of students meeting the Oregon State AYP targets in English/language arts, mathematics, attendance or graduation, and participation in statewide assessments. A Title I school that does not meet one or more targets, or does not make sufficient progress, for two consecutive years is identified as needing improvement.

\_\_\_\_\_ School has been identified for improvement for the following reasons:

***(List reasons for the identification. In addition, explain how the school compares in terms of academic achievement to other schools served by the district and the state.)***

We want you to be aware that steps are currently being taken to address the problems that caused the school to be identified. An improvement plan will be developed in consultation with parents and the school staff, with technical assistance provided by the district office. Parents will have more opportunities to provide input through an expanded policy on parental involvement, which will further assist students to meet high academic standards.

*(Describe what the school is doing to address the problems.)*

The district is required to notify you of the option to transfer your child to another school within the district that has not been identified for improvement. The following is a list of schools in the district that have met the target areas and are available to accept transfers:

(A list of schools and their academic achievement information is required. Additional information may be included, such as descriptions of special programs or professional qualifications of teachers. This notification must provide parents with enough relevant information to help them decide which school is best for their child. If applicable, explain why some schools might not be available for transfers.)

The district will provide transportation to the new school, subject to certain cost limitations. Priority will be given to students based on educational and financial need. Your child may remain at the new school through its highest grade. The district is only required to provide transportation to the new school for as long as the original school remains in improvement status.

If you are interested in the transfer option please contact the district office and request a form be sent to you. The completed applications must be returned to the district office by (date).

Choosing a school for your child is an important decision. Please consider the transfer option carefully, and contact the district office with any questions you might have.

Sincerely,

Superintendent

**Sample Parent Notification Letter—Transfer Option Not Available**

Sample Letter

Dear Parents or Guardian,

The No Child Left Behind Act requires that schools be evaluated each year to determine if they are making adequate yearly progress (AYP). This evaluation is based on the number of students meeting the Oregon State AYP targets in English/language arts, mathematics, attendance or graduation, and participation in statewide assessments. A Title I school that does not meet one or more targets, or does not make sufficient progress, for two consecutive years is identified as needing improvement.

\_\_\_\_\_ School has been identified for improvement for the following reasons:

***(List reasons for the identification. In addition, explain how the school compares in terms of academic achievement to other schools served by the district and the state.)***

We want you to be aware that steps are currently being taken to address the problems that caused the school to be identified. An improvement plan will be developed in consultation with parents and the school staff, with technical assistance provided by the district office. Parents will have more opportunities to provide input through an expanded policy on parental involvement, which will further assist students to meet high academic standards.

*(Describe what the school is doing to address the problems.)*

The district is required to notify you of the option to transfer your child to another school within the district that has not been identified for improvement. However, there is not another school available in our district to accept transfers.

*(Explain why there is not an available school for transfers. If there is an agreement with another local LEA to accept transfers, explain that option. A list of schools and their academic achievement information is required. Additional information may be included, such as descriptions of special programs or professional qualifications of teachers. This notification must provide parents with enough relevant information to help them decide which school is best for their child. If applicable, explain why some schools might not be available for transfers.)*

*(Districts are also encouraged to consider offering supplemental education services during the first year of school improvement, but this is not required. If supplemental services will be available, explain them and attach a description of the services, qualifications, and effectiveness of the approved providers.)*

Please contact the district office with any questions you might have.

Sincerely,

Superintendent

**Sample Parent Notification Letter—  
Transfer Option or Supplemental Education Services Available**

Sample Letter

Dear Parents or Guardian,

The No Child Left Behind Act requires that schools be evaluated each year to determine if they are making adequate yearly progress (AYP). This evaluation is based on the number of students meeting the Oregon State AYP targets in English/language arts, mathematics, attendance or graduation, and participation in statewide assessments. A Title I school that does not meet one or more targets, or does not make sufficient progress, for two consecutive years is identified as needing improvement. School is in the second year of improvement.

***(List reasons for the identification. In addition, explain how the school compares in terms of academic achievement to other schools served by the district and the state.)***

We want you to be aware that steps are currently being taken to address the problems that caused the school to be identified. An improvement plan will be revised in consultation with parents and the school staff, with technical assistance provided by the district office. Parents will have additional opportunities to provide input through a more comprehensive policy on parental involvement, which will further assist students to meet high academic standards.

*(Describe what the school is doing to address the problems.)*

The district is required to notify you of the option to transfer your child to another school within the district that has not been identified for improvement. The following is a list of schools in the district that have met the target areas and are available to accept transfers:

(A list of schools and their academic achievement information is required. Additional information may be included, such as descriptions of special programs, or professional qualifications of teachers. This notification must provide parents with enough relevant information to help them decide which school is best for their child. If applicable, explain why some schools might not be available for transfers.)

The district will provide transportation to the new school, subject to certain cost limitations. Priority will be given to students based on educational and financial need. Your child may remain at the new school through its highest grade. The district is only required to provide transportation to the new school for as long as the original school remains in improvement status.

Because the school is in the second year of identification, we are providing an additional option of supplemental educational services to eligible students who remain at the school rather than transferring. Supplemental services are tutoring or classes that provide additional academic assistance to a child outside of the regular school day. A description of the services, qualifications, and effectiveness of the approved providers is attached to this letter.

The district will cover the costs of the supplemental services, subject to certain cost limitations. Transportation to and from providers not located at the school site is the responsibility of the parent. As with the transfer option, priority will be given to students based on educational and financial need.

If you are interested in either the transfer option **or** the supplemental services option please contact the district office and request a form be sent to you. The completed applications must be returned to the district office by (date).

Choosing one of the two options explained above is an important decision. Please consider both options carefully, and contact the district office with any questions you might have.

Sincerely,

Superintendent



## School Choice Options

NCLB includes several provisions designed to increase student and parental choice. Districts must give students attending schools in school improvement status the options of (1) attending another public school or (2) receiving supplemental educational services, depending on the eligibility and the status of the schools. The choice to attend another public school is available to all students enrolled in schools that are in their first year of school improvement status and for subsequent years that the school remains identified for improvement. Supplemental educational services are available to eligible students who are enrolled in a school in its second year of improvement and for subsequent years. When both options are available, parents have the choice of which option they would prefer for their child. For more information about the school choice option, refer to the *Public School Choice Non-Regulatory Guidance* from the U.S. Department of Education at <http://www.ed.gov/policy/elsec/guid/schoolchoiceguid.doc>. For more information about supplemental educational services, refer to the *Supplemental Education Services Non-Regulatory Guidance* from the U.S. Department of Education at <http://www.ed.gov/policy/elsec/guid/suppsvcsguid.doc>

## Transportation Set-Aside

Districts receiving funds under Title I are required to make public school choice available to all students in Title I schools identified for school improvement status. Students who are enrolled in Title I schools are eligible to transfer to another school if their school has been identified for (1) school improvement; (2) corrective action; or (3) restructuring. The district is responsible for paying all or a portion of the transportation necessary for students to attend their new schools, subject to certain limitations:

1. Districts with schools in school improvement must spend the equivalent of 20 percent of their Title IA allocation on choice-related transportation, or a lesser amount that satisfies all the demand from the parents of eligible students for transportation.
2. A district may use Title IA funds, as well as other allowable Federal, State, local and private resources, to pay for the transportation required to implement the Title I School Choice requirement. A district may use their Title VA funds and funds transferred into Title IA or Title VA from other Federal Title programs that allow “transferability”.
3. The 20 percent must be calculated before the district determines its set-asides for parent involvement, private schools, homeless or other purposes as listed on the Federal Funding Application Workbook Title IA Set-Asides.
4. A district must include any funds transferred into Title IA in the base used in calculating the “amount equal to 20 percent” of its Title IA allocation, to determine required expenditures for choice-related transportation and supplemental educational services.
5. Some districts may have no schools available to which students can transfer. This situation might occur when all schools at a grade level are in school improvement or when the district has only a single school at that grade level. It may also occur where a district’s schools are so remote from one another that choice is not practical. For example if the only other elementary school is over 100 miles away, then choice is likely impractical. On the other hand, if other potential school choices are located outside a district-defined attendance zone or boundary, these boundaries may not be used to prevent student transfers.



- a. The district must, to the extent practicable, enter into cooperative agreements with other districts in the area or with charter and “virtual schools” in the state.
  - b. The district may chose to offer supplemental services to students attending schools in the first year of improvement who cannot be given the opportunity to change schools, but this is not required.
6. A district may have a general policy of not providing transportation to students who live within a certain distance of their schools. For example, a district may have a policy that students must live more than one mile from their school before transportation is provided. In this school choice example, the district is not required to provide transportation to students who elect to transfer to schools within one mile of their home.
  7. A district has latitude in deciding which options to provide for eligible students. The district may establish zones based upon geographic location and fully fund transportation to different schools within a zone, which allows the district to offer more than one choice of school while ensuring that transportation can be reasonably provided or arranged.
  8. The Title IA “supplement not supplant” requirement applies to transportation funds. For example, if a district is required by State or local law to provide transportation to students who choose to transfer to another school under an existing choice plan, it may not use Title IA funds to supplant the State or local funds that the district would otherwise use to provide transportation, even though transportation costs generally are an allowable use of Title IA funds.

### **Supplemental Educational Services**

Districts are required to offer supplemental educational services as an option to students attending a school in its second year of school improvement, or undergoing corrective action or restructuring. As noted previously, some districts will not be required to provide supplemental educational services because they have no schools in those categories, but may choose to offer supplemental services to students with no transfer option available. Regardless of the circumstances, the following guidelines for supplemental educational services apply:

1. Eligible students are all students from low-income families who attend Title I schools that are in their second year of school improvement, in corrective action or in restructuring (or if the district chooses to offer supplemental educational services to students where there is no transfer option available). If the funds available are insufficient to provide supplemental services, the district must give priority to providing services to the lowest-achieving eligible students.
2. The law establishes a joint funding mechanism for choice-related transportation and supplemental educational services [NCLB Section 1116(b)(10)]. As described in the school choice transportation section above, unless a lesser amount is needed to meet parent requests for choice-related transportation and to satisfy all requests for supplemental educational services, an district must spend an amount equal to 20 percent of its Title IA allocation, before set-asides on
  - b. Choice-related transportation;

- c. Supplemental educational services; or
  - d. A combination of choice-related transportation and supplemental educational services.
3. This flexible funding approach means that the amount of funding that a district must devote to choice-related transportation depends in part on how much it spends on supplemental education services. However, if the cost of satisfying all requests for supplemental educational services exceeds 5 percent of a district's Title IA allocation, the district may not spend less than an amount equal to 5 percent on supplemental services. Similarly, if the demand from parents of eligible students for transportation needed for choice exceeds 5 percent of the allocation, the district must spend the equivalent of at least 5 percent on transportation. The district has flexibility in allocating the remaining 10 percent between choice-related transportation and supplemental educational services, and in doing so should take into consideration the level of parental demand and the costs of meeting that demand.
  4. When Title IA funds are reserved for choice-related transportation and supplemental educational services, districts are not permitted to reduce Title IA allocations to schools identified for corrective action or restructuring by more than 15 percent.
  5. A district may use School Improvement grant funds made available under NLCB Section 1003 to pay for school choice and/or supplemental educational services.
  6. If the district has reserved more Title IA funds than needed to pay for choice transportation and supplemental services the excess funds may be reallocated to schools or for other allowable Title IA activities. However, before making a decision to reallocate these funds, districts should ensure that eligible students and their families have had adequate time to avail themselves of the opportunity to transfer schools or to receive supplemental educational services.

For a list of state approved supplemental educational services providers, see <http://www.ode.state.or.us/search/results/?id=145>



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# Oregon Title I Handbook

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## **CH. 14 TITLE IA PROGRAM REVIEW**

### **Oregon Department of Education Monitoring Process**

As a regular part of its functions, the Title I Office at the Oregon Department of Education schedules and conducts on-site visitation to districts receiving Title I grants. As the primary grant recipient, the Oregon Department of Education provides sub-grants to local districts. This relationship creates a joint responsibility for assuring that federal funds are spent in accordance with the law and all applicable regulations and guidance. The Oregon Department of Education is also charged with the responsibility of providing quality assistance to districts and schools receiving grants. The on-site visitations to districts are intended to support both roles: compliance and program assistance.

#### **Questions and Answers on Visits**

<b>How are districts selected for on-site visitations?</b>
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Five factors influence when districts will be visited.

1. Time elapsed since last site visit
2. Quality of most recent NCLB Sub-grant Application
3. Requests for program evaluation
4. Formal compliance filed with the Oregon Department of Education
5. Program improvement status

<b>How should the district prepare for a visit?</b>
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Review and use the check sheets included in the Title I Handbook. Many districts set up permanent files using these check sheet questions and establish a process of ongoing maintenance. Beyond this basic preparation, the district will be given an opportunity to work with the visitation team leader to design the visit to meet your specific program questions and needs.

<b>Is there a written report of the visit and what does it include?</b>
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Yes. Within six weeks of the visit, the district will receive a written report. The report generally includes an overview of all NCLB Programs as well as program specific reports. The reports are organized into overviews, findings (non-compliance issues that must be resolved), commendations and recommendations. While not binding, recommendations often address those issues and ideas the team suggests to improve program quality. Attached to the written report are final copies of the completed check-off sheets used during the visit.

<b>What does a typical onsite NCLB Program Review look like?</b>
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Reviews are typically one or two days, although they may be longer for larger districts. The reviews often begin with a meeting of all NCLB program coordinators and other administrative staff. This meeting is to address cross-program issues and to answer specific questions by the district. Following the opening meeting, individual team members review program documentation. The remainder of the visit is spent visiting schools to confirm and support the district's written descriptions and plans. The visit ends with an exit meeting, usually with program coordinators and the superintendent or superintendent's representative. The exit meeting is an informal review of the findings and commendations emerging from the visit.

**Does the team look for the same things in each district?**

NCLB Program Reviews are guided by a commitment to be thorough, consistent and fair.

**What happens if there is a finding of non-compliance for one or more of the NCLB programs being reviewed?**

It is not the purpose of the visit to impose penalties on the district for non-compliance issues. Rather, it is the ODE's purpose to ensure the district is compliant with the laws and regulations by providing assistance in resolving any non-compliance issues. Once a finding is described, the team leader will work with the district to develop strategies and timelines for resolving the issues.

**Are there program areas that are of particular interest to the review team?**

Although the team will do a general review of all aspects of the program, several key issues are identified for more in-depth review. This part of the review is more focused on program quality and assistance than on compliance. In the past few years, visits focused on these areas:

1. Schoolwide Programs: Planning, Implementation and Updating
2. Service to Emerging Language Learners (ELL)
3. Program Strategies for Highly Mobile Students
4. Program Strategies for Ensuring Highly Qualified Staff

**Is there anything else the district needs to know to prepare for a visitation?**

Because visits are designed to meet not only the needs of the visitation team but also the district, each district should feel free to suggest specific modification or additions to the visit that will assist it in developing high quality NCLB programs in the larger context of school improvement.

TITLE I – TECHNICAL ASSISTANCE AND PROGRAM REVIEW

**ADMINISTRATIVE PROCEDURES**

Question	Regulatory Reference	Evidence May Include	Notes/Findings
1. Does the district have a consolidated sub-grant plan and current state approved 3140 on file at the district office?	Sec. 1112(a)	<ul style="list-style-type: none"> <li>• Copy of plan.</li> <li>• Signed 3140.</li> </ul>	
2. Does the district have evidence of compliance with the comparability requirements on file?	Sec. 1120A(c)	<ul style="list-style-type: none"> <li>• Comparability worksheet.</li> <li>• Policy governing comparability of personnel, materials &amp; supplies.</li> </ul>	
3. Has the district targeted eligible school attendance areas/schools for Title 1A programs? (Applicable to districts with a total enrollment over 1000 or with more than one building per one grade span.)	Sec. 1113(a)(b)	<ul style="list-style-type: none"> <li>• Documentation demonstrating selection of schools for Title IA by rank order of poverty.</li> </ul>	
4. Does the district have documentation that each targeted assistance school has clear criteria and procedures for establishing an eligible pool and selecting students in greatest academic need for Title 1A services?	Sec. 1115(b)	<ul style="list-style-type: none"> <li>• Description of criteria used for student selection in Targeted Assisted Schools.</li> </ul>	
5. Are staff schedules which indicate district adherence to required limits on non-instructional duties/activities on file in district office?	Sec. 1115(d)	<ul style="list-style-type: none"> <li>• Staff schedules.</li> <li>• Time sheets.</li> </ul>	
6. Does district have documentation of proper certification/license/endorsements for instructional staff in district office?	Sec. 1115(c); TSPC Regulations; OAR 584-36-015 (2)	<ul style="list-style-type: none"> <li>• Copy of teacher(s) license/endorsement. (If teaching reading or math more than half time, the appropriate subject area endorsement is required.)</li> </ul>	
7. Does the district have documentation of appropriate programs, activities, and procedures for the involvement of parents?	Sec. 1118(a)	<ul style="list-style-type: none"> <li>• Written district parent policy (updated).</li> <li>• School-parent plan and compact</li> <li>• Schedule of activities</li> </ul>	

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Administrative Procedures Continued

Question	Regulatory Reference	Evidence May Include	Notes/Findings
8. Does district have documentation of timely and meaningful consultation with private school officials during design and development of the consolidated plan, including mutually agreed upon comparable programs to serve eligible students?	Sec. 1120(a)	<ul style="list-style-type: none"> <li>Letters sent and dates of meetings.</li> <li>Documentation of conversations.</li> </ul>	
9. Does the district have documentation that reserve funds (Sec. 1112[b]) have been established appropriately to provide services for:	Sec.'s	<ul style="list-style-type: none"> <li>Budget document listing/describing district reserved funds. (set-asides)</li> </ul>	
9a. Parental Involvement?	1118(a)		
9b. Homeless students?.	1113(c)		
9c. Neglected students?.	1113(c)		
9d. Delinquent students?	1113(c)		
10. Does the district have documentation that programs are designed and in place for meeting the same state content standards and student performance standards that all children are expected to meet for:		<ul style="list-style-type: none"> <li>Programs may be described informally by staff.</li> <li>Course statements (where appropriate). Course descriptions or program narrative in parent/student handbook.</li> </ul>	
10a. Limited English Proficient students?			
10b. Migratory students?	Sec. 1112(b)		
10c. Homeless students?			
10d. Neglected students?			
10e. Delinquent students?			
11. Does the district have procedures that provide for the supervision of instructional assistants and which ensure that certified personnel are planning instructional programs?	TSPC; OAR 584-36-011	<ul style="list-style-type: none"> <li>District coordinator and/or teacher(s) may state what the procedures are and who is directly responsible for supervision</li> <li>I A's may indicate their time schedules and to whom they are accountable</li> </ul>	
12. Does the district have consistent procedures for Schoolwide Program development:	Sec. 1114 (a)(b)	Policy or written procedures describing: <ul style="list-style-type: none"> <li>Process for schools in planning</li> <li>Review of SWP Plan prior to implementation</li> <li>First year implementation</li> <li>Annual review</li> </ul>	
13. Does the district have currently operating SWP Plans on file with accompanying reviewer evaluation information?	Sec. 1114(b)	<ul style="list-style-type: none"> <li>SWP Plan(s) with review document(s)</li> </ul>	

Administrative Procedures Continued

Question	Regulatory Reference	Evidence May Include	Notes/Findings
14. Does the district have a clear process for handling Title IA related complaints?	General Provision Regs, Sec. 299.11	<ul style="list-style-type: none"> <li>School Board Policy or written procedures document</li> </ul>	
15. Does the district annually disseminate to parents and private school officials, free of charge, information clearly describing the district's complaint procedures?	General Provision Regs, Sec. 299.11	<ul style="list-style-type: none"> <li>School Board Policy or written procedures document</li> <li>Sample letter, announcements, copies of district documents (i.e., handbook) in which these procedures are described for parents/private school officials</li> </ul>	
16. Does the district have evidence of high quality, professional development opportunities?	Sec. 1119	<ul style="list-style-type: none"> <li>Professional Development Agendas</li> <li>Documentation of staff attendance</li> <li>CPD Records</li> </ul>	

**FISCAL REVIEW**

Question	Regulatory Reference	Evidence May Include	Notes/Findings
1. Does the district maintain separate fiscal records for Title 1A?	Sec. 1120(a)	<ul style="list-style-type: none"> <li>Last fiscal audit, federal funds narrative (note any audit exceptions).</li> <li>Approval for withholding indirect charges.</li> <li>Final, approved Title IA budget.</li> <li>Last quarter receipts.</li> </ul>	
2. Is equipment purchased with Title 1A funds on inventory, so marked, and appropriately placed?	Sec. 1120(b)	<ul style="list-style-type: none"> <li>List of equipment purchased last year.</li> <li>Inventory.</li> <li>Equipment marked &amp; available for student use.</li> </ul>	
3. Did the district have authorization from the board to apply for Title 1A funds?	Sec. 1112(c)	<ul style="list-style-type: none"> <li>Board approved action in meeting minutes. (This date corresponds to date submitted on sub-grant application certification page.)</li> </ul>	
4. Has the district appropriately allocated Title 1A funds to eligible buildings in rank order of poverty?	Sec. 1113(c)	<ul style="list-style-type: none"> <li>Documentation (usually a spreadsheet) describing flow of Title IA funds from LEA to buildings.</li> </ul>	
5. Are school budgets consistent with allocation plan described in approved application?	Sec. 1113	<ul style="list-style-type: none"> <li>Building budget document</li> <li>Title I program budgets in TAS</li> <li>Current fiscal expenditure records</li> </ul>	

**EVALUATION REVIEW**

<b>Question</b>	<b>Regulatory Reference</b>	<b>Evidence May Include</b>	<b>Notes/Findings</b>
1. Has the district established an annual review process for schools served by Title 1A funds to determine whether each school is making adequate progress toward enabling its students to meet the state content and performance standards?	Sec. 1116(a)	<ul style="list-style-type: none"> <li>District documentation or description of local assessment system.</li> </ul>	
2. Does the district have a process for publicizing and disseminating the results of its annual review of Title 1A funded Schools?	Sec. 1116(a)	<ul style="list-style-type: none"> <li>Board policy.</li> <li>District on school plans including timeline.</li> <li>District staff may describe informally during review.</li> </ul>	
3. Is there evidence that the district is fulfilling its program improvement responsibilities?	Sec. 1116(c)	<ul style="list-style-type: none"> <li>Last AYP report(s)</li> <li>Description of the district processes for support of schools needing improvement.</li> </ul>	
4. Has the district implemented reasonable adaptations and accommodations for students with diverse learning needs (inclusive of Limited English Proficient students) necessary to measure the achievement of such students relative to state content standards?	Sec. 1111(b)(3)(F)	<ul style="list-style-type: none"> <li>District/school awareness of assessments and inclusive adaptations for state tests may be stated.</li> <li>Array and variety of evaluated pieces of student work showing ability.</li> <li>Documented/described processes for student identification.</li> </ul>	

**BUILDING REVIEW**

<b>Question</b>	<b>Reference</b>	<b>Evidence May Include</b>	<b>Notes/Findings</b>
1. Do Title 1 schools provide enriched and accelerated educational programs for all children?	Sec. 1001(d)	<ul style="list-style-type: none"> <li>Evidence to be drawn from site visits.</li> </ul>	
2. Do schools coordinate and integrate services for children served by Title 1 to eliminate duplication and reduce fragmentation of the instructional program?	Sec. 1112(b)	<ul style="list-style-type: none"> <li>Evidence to be drawn from site visits.</li> </ul>	
3. Does evidence exist that substantial opportunities for staff development (as described in the approved consolidated plan) are being carried out ?	Sec. 1119(a)	<ul style="list-style-type: none"> <li>Evidence may be drawn from site visits and/or may include staff development calendar, process for approving teacher initiated staff development requests, examples of action research, etc.</li> </ul>	
4. Are Title IA funded instructional programs implemented in such a manner as to supplement and not supplant the regular education program?	Sec. 1120A(b)	<ul style="list-style-type: none"> <li>Evidence to be drawn from site visits.</li> </ul>	

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## **District Title I Program Review of Schoolwide Program**

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This review document is in alignment with Oregon Title I Schoolwide Program, Plan Review Criteria. All the elements that comprise the current schoolwide plan are presented with suggestions of data to be reviewed and questions to be asked of the school's planning team by the District Title I coordinator.

Although every school receiving Title I funds must conduct an evaluation of their program, the process presented in this document is not a required format. It is presented as one method, among many, of reviewing a Title I schoolwide program. It is not necessary for a school to collect all the data referred to in the following pages; however, it is necessary that the school collect data that will be useful to them as they evaluate their program.

The role of the Title I District Coordinator is to review the data and the plan, not to collect the data or analyze it for each school. The coordinator is responsible for ascertaining if the schoolwide plan is being faithfully implemented and that the school is collecting data that shows whether or not the plan is fulfilling the goals set out in the plan. The coordinator will work with the schoolwide team to this end. If the school is not meeting its goals, the coordinator will assist the school in revising the plan, revising the implementation, or, building an entirely new plan, based on a current needs assessment conducted by the school.

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**Planning Team**----- 3  
The schoolwide planning team is active in reviewing and adjusting the schoolwide plan

**Schoolwide Plan Review** ----- 3  
Each year the schoolwide plan needs to be reviewed by the school team and adjusted to the needs of the students.

**Communication** -----3  
A clear process for communication about the schoolwide plan must be ongoing throughout the year.

**Technical Assistance** -----4  
Technical assistance may be necessary for schools to review/revise their schoolwide plan.

**Comprehensive Needs Assessment**-----4  
The schoolwide plan must be built from a current needs assessment.

**Strengths and Needs** -----5  
Strengths and needs of current programs are identified from the comprehensive needs assessment.

**Inquiry (Research)**-----5  
Revisions of the plan have used an inquiry process to address priority needs.

**Program Goals**----- 5  
The program goals are derived from the needs assessment and the inquiry process.

**Instructional Program** ----- 6  
Program goals reflect the needs of educationally disadvantaged students.

**Professional Development**----- 6  
Professional development supports the schoolwide plan and is available to the entire school community.

**Parental Involvement**----- 7  
Strategies to increase parental involvement support the academic goal.

**Monitoring/Evaluation** ----- 8  
Assistance is provided to students who experience difficulty mastering standards.

**Coordination**----- 9  
The schoolwide plan is coordinated with other school improvement efforts.

**Ongoing Program Development**----- 9  
The schoolwide team meets on an ongoing basis to monitor and adjust the plan.

**Fiscal Requirements** -----10  
All funding sources are being used to reform total instructional program.

---

## Elements of a Title I District Schoolwide Review

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### Planning Team

The schoolwide plan was developed and is **reviewed annually** by a team including teachers, a building administrator, parents and other pupil service personnel, and, where appropriate, community members, business partners and students.

#### **Evidence:**

- List of team members.
- Position of Members.
- At least one participant per category.
- Records of meeting dates and topics discussed.

#### **Sample questions you might ask of the school:**

- Do you have balanced representation on the team from ESL, Migrant, regular ed., parents, special ed.?
- Were parents of migrant students involved in planning related to the use of migrant funds in the schoolwide program?
- What is the site council's role in this process?

---

### Schoolwide Plan Review

The schoolwide plan was reviewed by the entire school community.

#### **Evidence**

- Review process is articulated and documented.

#### **Sample questions you might ask of the school:**

- Who is involved in the review process?
- Describe how revisions are made to your plan.

---

### Communication

The schoolwide plan was reviewed and revised with input from the entire school community and there is a clear process for communication.

#### **Evidence**

- Description of communication process.*
- Staff support is measured and documented.*

#### **Sample questions you might ask of the school:**

- *Does your leadership team receive regular input from staff and parents?*
- *Are parents and all staff aware that this school is operating as a Title I schoolwide program and what that means?*

---

### Technical Assistance

The schoolwide program is reviewed/revised with high quality technical assistance.

**Evidence:**

- Dates of technical assistance.
- Description of technical assistance.

**Sample questions you might ask of the school:**

- If you did not use technical assistance to review your plan would you like to arrange it for the future?
- Is there any part of the review/revision process you would like assistance completing?

---

### Comprehensive Needs Assessment

The schoolwide plan goals listed are based on evidence drawn from an up-to-date, comprehensive needs assessment of the entire school that compares performance of students in relation to Oregon Content standards.

**Evidence:**

- Current profile data.
- Updated needs assessment and achievement data.
- The school profile includes information about student learning and the five dimensions that affect it.
- AYP information is current.
- Needs assessment includes all students but focuses on educationally disadvantaged students.  
Progress is measured using local assessments

**Sample questions you might ask of the school:**

- Are the current needs the same as those you identified last year? If not, how are they different?
- Have your students made adequate progress in the program?
  - Reading progress students most in need, LEP, Spec. Ed., Subgroups are making adequate yearly progress based on AYP target or school's Growth Target for each subgroup
  - LEP students are meeting English Language proficiency goals,
  - Math progress: Subgroups are making adequate yearly progress based on AYP target or school's Growth Target for each subgroup
  - If adequate progress was not made, what changes will be made?

---

### Strengths and Needs

Strengths and needs of the current program are based on an interim and annual evaluation of the plan..

#### **Evidence:**

- An analysis has been made of the plan and current profile data.
- Priority needs have been identified, based on data.
- Areas of strength have been identified.

#### **Sample questions you might ask of the school:**

- Do your Priority Needs agree with the perception of the staff's priority needs? With the parents' priority needs?
- Have you shared your strengths with parents, teachers and students?

---

### Inquiry (Research)

Revisions of the plan have used an inquiry process to address priority needs.

#### **Evidence:**

- Specific profile data was used to make program choices.
- Programmatic revisions address priority needs.

#### **Sample questions you might ask of the school:**

- Are you satisfied with the results of your needs assessment and inquiry process?
- What evidence based research did you use to address your needs?
- Is the appropriate data available to make program decisions
- What, if anything, do you need to change in your needs assessment or inquiry process?

---

### Program Goals

The schoolwide program goals are based on the results of the needs assessment and inquiry process.

#### **Evidence:**

- Measurable academic goals.
- Profile data listed to support current goals.
- Process to measure goals.

#### **Sample questions you might ask of the school:**

- What modifications in programs have you made meet the needs of your students?
- What evidence did you base these changes on?
- Have those modifications been successful?

---

## **Instructional Program** ✓

Schoolwide program goals reflect the needs of educational disadvantaged students.

### **Evidence:**

- In the plan the needs of ELL and high risk populations are addressed.
- There are increased learning time opportunities.
- Instructional strategies are effective.
- Evaluation plans have been made and are being used.

Students most at risk of not meeting the standards are being served.

- Support staff are used effectively**

### **Sample questions you might ask of the school:**

- Does the instructional program match your goals?
- What modifications have you made in the instructional program to meet the needs of your students?
- How do you determine which students are most in need of services?
- What collaboration occurs between specialists and classroom teachers?

---

## **Professional Development and Highly Qualified Staff** ✓

The schoolwide plan provides ongoing professional development for teachers and instructional assistants, principals and, where appropriate, others including parents to enable all children in the school meet Oregon's performance standards.

*Instruction is delivered by highly qualified professional staff.*

### **Evidence:**

- Professional development plan in place.
- Activities reflect needs in profile data.
- Professional development activities are tied to student academic needs.
- All instructional staff meet highly qualified requirements.
- Para-educators are supervised by certified staff.

### **Sample questions you might ask the school:**

- Is the professional development activities
- Are all certified staff "Highly Qualified?"
- Are all paraprofessionals who provide instruction in core subjects "Highly Qualified?"
- How is your professional development helping to meet the needs of your most at risk students?
- How does your professional development meet your priority needs?

- What ongoing professional development do paraeducators receive?

---

### **Parental Involvement**

Strategies to increase parental involvement such as parents supporting their children's academic progress, and parents are involved in leadership opportunities such as Site Council, advisory groups, PTA. Family literacy services are in place if appropriate, and parent involvement activities clearly support the academic goal.

#### **Evidence:**

- A variety of family involvement opportunities are offered that support academic goals.
- Parent evaluations of activities offered.
- Parent conferences are scheduled
- Parent Compact. with NCLB requirements
- Copy of school's parent involvement policy.
- Parent information is provided in language(s) understandable to a variety of parents
- Records of parent involvement.
- Records of parent conferences.
- Newsletters, and/or other communication tools are in place.

#### **Sample questions you may ask the schools:**

- Have you had or are you planning parent meeting(s)?
- Is your parental involvement plan current?
- To what extent have you implemented your Parent-Teacher Compact?
- How are parents involved in supporting academic growth of children?
- Does the Compact need revision?
- Did parents help create the school's Parent Involvement Policy? Does it need any revisions?

## Monitoring/Evaluation

There are activities to ensure that students who experience difficulty mastering standards shall be provided with timely additional assistance such as:

- a) *measures to ensure that students' difficulties are identified on a timely basis and which provide sufficient information on which to base effective assistance;*
- b) *teacher-parent conferences for any student who has not met proficiency, parent-teacher conferences to discuss what the school will do to help the student meet proficient standards, what the parents will do to help the students improve his/her performance and additional assistance available to the student at school or in the community;*
- c) *teachers are included in decisions regarding the use of assessments and how they will be used to determine which students will receive additional assistance;*
- d) *the schoolwide plan includes a description of the system(s) of individual student assessment in place in the school and how the school will provide individual assessment results to parents.*

### **Evidence:**

- Procedures for measuring student progress.
- Activities for students not meeting standards.
- State and local assessments as indicators.
- Indications of how teachers monitor success.
- Criteria for student assistance, including teacher judgment and recommendation.
- Local assessment measures  
Indication of multiple student assessments.

### **Sample questions you may ask the schools:**

- Are you satisfied with the assessment tools you have been using to monitor student progress? Are you satisfied with the frequency that the local assessments are completed.
- Please describe any new assessment tools you will be using next year.
- Please describe your process for choosing assessment tools.
- How are assessments used to guide instructors?
- Are assessment results shared with parents?



**Coordination** ✓

Plans for the transition of preschool children into elementary schools and any other appropriate transitions. There is evidence of coordination with other family service programs and agencies. *The schoolwide plan is coordinated with other school improvement efforts.*

**Evidence:**

- Coordination plans with agencies.
- Coordination with other school improvement efforts.
- Copy of the transition plan for pre-K Kindergarten or first grade.

Sample questions you may ask the schools:

- Is your transition plan effective?
- Are there changes you need to make?
- What, if anything, can you do to foster cooperation with community agencies?

---

**Ongoing program Development** ✓

The schoolwide planning team meets on an ongoing basis to monitor and evaluate the effectiveness of the plan, adjusting to changing student needs.

**Evidence:**

- Schedule of dates.
- Description of on-going process of monitoring the components of the plan.
- Assessment of student performance relative to the plan's goal.

Sample questions you may ask the schools:

- Is your team satisfied with quality and quantity of meetings you have held this year?
- Please describe any difficulties you have had planning and scheduling meetings.
- Describe adjustments you made to your plan as a result of evaluation.

## **Fiscal Requirements**

The schoolwide plan lists state, district and federal programs that are included and describes how funds from each will be used to reform the total instructional program.

### ***Evidence:***

- Funding sources listed*
- Use of funds described.*
- SWP budget summary*
- Funding sources listed.*

### **Sample questions you may ask the Schools:**

- Are you satisfied that you are using resources effectively?
- Do you plan to allocate your resources any differently next year?

**District Title I Program Review of Schoolwide Program**

**Checklist**

- Planning Team**
- Schoolwide Plan Review**
- Communication**
- Technical Assistance**
- Comprehensive Needs Assessment**
- Strengths and Needs**
- Inquiry (Research)**
- Program Goals**
- Instructional Program**
- Professional Development**
- Parental Involvement**
- Monitoring/Evaluation**
- Coordination**
- Ongoing Program Development**

Name of School: \_\_\_\_\_

Name of Reviewer: \_\_\_\_\_

Date of Review: \_\_\_\_\_

## **District Title I Program Review of Targeted Assistance Program**

In a TAS, children eligible for Title I are those most at risk of failing to meet high standards as determined by multiple indicators. In addition to selecting a specified group of children to receive Title I services, the district is required to keep clear fiscal records for each TAS which separates and tracks all sources of funding. Title I funds may not be commingled. In TAS, Title I funds are traditionally used to add supplemental reading and/or math programs serving a select number of identified students.

Although every school receiving Title I funds must conduct an evaluation of their program, the process presented in this document is not a required format. It is presented as one method, among many, of reviewing a Title I program. It is not; however, necessary for a school to collect all the data referred to in the following pages, it is necessary that the school collect data that will be useful to them as they evaluate their program.

The role of the Title I District Coordinator is to review the data and the Title I program, as articulated in the School Improvement Plan, not to collect the data or analyze it for each school. The coordinator is responsible for ascertaining that the Title I program is being implemented and is in agreement with the SIP and that Title I services are being offered to the most needy students. The coordinator is not responsible for evaluating the school's program, but is responsible to review the school's evaluation of it's self. If the school is struggling with their evaluation, the coordinator may make arrangements for the school to obtain technical assistance.

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## **Elements of a Title I District Targeted Assistance Review**

### **Title I Committee** ✓

The Title I Program plan was developed, and is reviewed annually, in the context of the school improvement plan, by a committee including teachers, a building administrator, parents, other pupil service personnel and, where appropriate, community members, business partners and students.

#### **Evidence:**

- List of committee members
- At least one participant per category
  - Records of meeting dates and topics discussed

#### **Sample questions you might ask of the school:**

- Do you have balanced representation on the committee from ESL, Migrant, regular ed., parents, special ed.?
- What is the site council's role in the Title I program?

### **School Improvement Plan Review** ✓

The entire school community, including Title I staff, reviewed the school improvement plan.

#### **Evidence:**

- Review process is articulated and documented
- Title I staff are routinely a part of the review process

#### **Sample questions you might ask of the school:**

- Who is involved in the review process?
- Describe how revisions are made to your plan to better serve students targeted to receive Title I services.

### **Communication** ✓

The school improvement plan was reviewed and revised with input from the entire school community (including the Title I staff and the parents of students being served by Title I) and there is a clear process for communication.

#### **Evidence:**

- Description of communication Process*
- Staff support is measured and documented*

#### **Sample questions you might ask of the school:**

- *Does your leadership team receive regular input from Title I staff and parents?*
- *Are parents of students served by Title I informed of the services their students are receiving?*

---

### **Comprehensive Needs Assessment**

The school improvement plan goals listed are based on evidence drawn from an up-to-date; comprehensive needs assessment of the entire school that compares performance of students in relation to Oregon Content standards.

#### **Evidence:**

- Profile data
- Current needs assessment.
- AYP information is current.
- Needs assessment includes all students, including students targeted for Title I services.

#### ***Sample questions you might ask of the school:***

- Are the current needs the same as those you identified last year? If not, how are they different?
- Have your students made adequate progress in the program?
  - Reading progress Math progress, if appropriate
- If adequate progress was not made, what changes will be made?
- How have you measured this progress?
- Will you use the same assessment next year? If not, why not?

---

### **Targeting Students for Title I Services** ✓

An objective, systematic process should be used to select students, grades 3-12 in greatest need. Teacher judgment may be used as part of the selection criteria for K-2 students. The student selection process will result in a rank ordering of all students for each subject area. Students must be selected in rank order from the list, including k-2.

- a) Students in greatest need are to be served in rank order.
- b) Selection is based on multiple educationally related, objective criteria established by the district and supplemented by the school.
- c) Except for grades k-2, teacher referral can never be the primary factor for placing a student into the Title I program.
- d) Reasons for serving a low-priority student ahead of a high priority student must be documented.

#### **Evidence:**

- The selection of students to be served by Title I is made using a rank ordered list.*
- The selection criteria are appropriate teacher referral is not the primary factor for placing a student (excepting k-2).*
- Students in greatest need are served in rank order.*
- Documentation of any low-priority student being served out of order are documented.*

#### **Sample questions you might ask the school:**

- *Are you serving your students in greatest need?*
- *What selection criteria are you using?*
- *Are you satisfied with your selection process?*

---

### **Strengths and Needs** ✓

Strengths and weakness of the current Title I program are based on a comprehensive needs assessment.

#### **Evidence:**

- An analysis has been made of data collected to measure the achievement of targeted students.
- Priority needs have been identified, based on data.
  - Areas of strength have been identified.

#### **Sample questions you might ask of the school:**

- Do your Title I Program priority needs align with the SIP?
- Have you shared your strengths with parents, teachers and students?



---

### **Inquiry (Research)**

Revisions of the Title I program have used an inquiry process to address priority needs.

#### **Evidence:**

- Data collected regarding targeted students was used to make program choices.
  - Programmatic revisions address priority needs.

#### ***Sample questions you might ask of the school:***

- Are you satisfied with the results of your needs assessment and inquiry process?
- Is the appropriate data available to make program decisions?
- What, if anything, do you need to change in your needs assessment or inquiry process?

---

### **Program Goals**

Title I program goals are measurable and based on the results of the SIP needs assessment and inquiry process. The program goals are specific to targeted students.

#### **Evidence:**

- Measurable academic goals.
  - Profile data listed.
- Process to measure goals.

#### ***Sample questions you might ask of the school:***

- How have you ensured that the needs of Title I students are addressed in the SIP?
- Is your Title I program plan supplemental to the SIP?

---

### **Instructional Program**

Title I program goals reflect the needs of the most at risk of the educationally disadvantaged students.

#### **Evidence:**

- The program addresses the needs of ELL and high-risk populations.
- There are increased learning time opportunities for targeted students.
- Instructional strategies are effective.
- The model for service to targeted students is documented.
- Evaluation plans have been made and are being used.
- Historically underserved populations are being served.

#### **Sample questions you might ask of the school:**

- Does the instructional program match your goals?
- Is the service delivery model effective for all targeted students?
- Describe how specialists and classroom teachers collaborate.

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## **Professional Development**

The Title I program provides ongoing professional development for teachers and instructional assistants, principals and, where appropriate, others including parents, to enable all children in the school meet Oregon's performance standards.

*Highly qualified professional staff delivers instruction.*

### **Evidence:**

- A professional development plan is in place.
- Activities reflect needs in profile data.
- Professional development activities are tied to targeted student academic needs.
- If in program improvement, the school has reserved 10% of its allocation to professional development and has a two-year plan.
- Training for teachers in identification of student difficulties and strategies for assisting individual students.
- Certified staff supervises Paraeducators

### **Sample questions you might ask of the school:**

- What activities have you done in the area of staff development?
- To what extent have you included all staff and parents in activities?
- How is your professional development helping to meet the needs of your most at risk students?
- How does your professional development meet your priority needs?
- What opportunities for professional development are offered for paraeducators?

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## **Parental Involvement**

Strategies to increase parental involvement are in place, and clearly support the academic goal.

### **Evidence:**

- variety of family involvement opportunities offered that support academic goals.
- Parent evaluations of activities offered.
- Parent conferences.
- Parent Compact.
- Copy of parent involvement plan.

### **Sample questions you may ask the schools:**

- Have you had or are you planning parent meeting(s)?
- Is your parental involvement plan current?
- To what extent have you implemented your Parent-Teacher-Student Compact?
- Does the Compact need to be revised?

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**Monitoring/Evaluation**

There are activities to ensure that targeted students who experience difficulty mastering standards shall be provided with timely additional assistance such as:

- e) *measures to ensure that students' difficulties are identified on a timely basis and which provide sufficient information on which to base effective assistance;*
- f) *teacher-parent conferences for any targeted student who has not met proficiency, parent-teacher conferences to discuss what the school will do to help the student meet proficient standards, what the parents will do to help the students improve his/her performance and additional assistance available to the student at school or in the community;*
- g) *Title I staff are included in decisions regarding the use of assessments and how they will be used.*

*Students who meet standards are exited from the program.*

**Evidence:**

- Procedures for measuring student progress.
- State and local assessments as indicators.
- Compact implemented.
- Records of parent.
- Conferences.
- Indications of how teachers monitor success.
- Local assessment measures.
- Indication of multiple student assessments.
- Exit criteria are documented and used.

**Sample questions you may ask the schools:**

Are you satisfied with the assessment tools you have been using to monitor student progress?  
Please describe any new assessment tools you will be using next year.  
Please describe your process for choosing assessment tools.

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**Coordination**

Plans for the transition of preschool children into elementary schools and any other appropriate transitions. Collaboration between special programs within the school.

**Evidence:**

- Meeting schedules, notes etc. documenting collaboration between Title I staff and special programs coordinators.
- Documentation of coordination with pre-schools for transitions.

**Sample questions you may ask the schools:**

- Is your transition plan effective?
- Are there changes you need to make?
- What, if anything, you can do to foster collaboration?

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### Ongoing Program Development

The Title I committee meets on an ongoing basis to monitor and evaluate the effectiveness of the program, adjusting to changing student needs.

#### Evidence:

- Schedule of meeting dates.
- Description of on-going process for monitoring the program.
- Assessment of student performance relative to the program's goal.

#### Sample questions you may ask the schools:

- Is your committee satisfied with the quality and quantity of meetings you have held this year?
- Please describe any difficulties you have had planning and scheduling meetings.

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### Fiscal Requirements

Records must be maintained that document that Title IA funds are spent on activities and services for only Part A participating students. Title IA funds may not be used to identify at risk students. Identification remains a district and school responsibility.

#### Evidence:

- Use of funds described.
- TAS budget summary.

#### Sample questions you may ask the schools:

- Do you plan to allocate your resources any differently next year?
- Are you satisfied that you are using all your resources in the most effective way?
- If not, please describe how you will allocate them?

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## **District Title I Program Review of Targeted Assistance Programs**

### **Checklist**

- Planning Team**
- School Improvement Plan Review**
- Communication**
- Comprehensive Needs Assessment**
- Targeting Students for Title I Services**
- Inquiry (Research)**
- Program goals**
- Instructional Program**
- Professional Development**
- Parental Involvement**
- Monitoring/Evaluation**
- Coordination**
- Ongoing Program Development**
- Fiscal Requirements**