

The Districts' Role in Implementing the Supplemental Educational Services Provisions of the No Child Left Behind Act

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Overview

The No Child Left Behind Act (NCLB), signed into law in January 2002, provides for children from low-income families enrolled in Title I schools that have not made adequate yearly progress (AYP) for three years or more to receive supplemental services, including tutoring, remediation, and other academic instruction. Implementing the supplemental services provisions of NCLB involves states, districts, schools, parents, and providers. Each state is required to develop criteria for selecting supplemental service providers and to publish a list of approved providers. School districts are responsible for notifying parents of their children's eligibility to receive supplemental services and for providing parents with adequate information to select providers for their children. Parents may select any approved provider in the area served by the school district or within a reasonable distance of the school district. Supplemental service providers are required to offer academic services that are consistent with the state's academic content standards and with the instruction provided by the school district. Providers are also required to measure students' progress toward meeting their educational goals and report regularly on that progress to teachers and parents.

This paper presents findings from case studies conducted during the 2003-04 school year, the second year that the supplemental services provisions of NCLB had been in effect. It follows up on baseline data collected the previous school year.¹ The study focused on the successes and challenges states, districts, schools, and providers faced in implementing the supplemental services under NCLB. Key evaluation questions included the following:

How were states and school districts implementing supplemental services?

How were states selecting providers?

How were school districts reaching out to and involving parents regarding supplemental services?

What services were provided?

What types of providers were offering and providing services?

What were the challenges and successes regarding implementation?

The study conducted interviews in a purposive sample of six states and nine school districts, which were selected to include those that appeared to be relatively far along in implementing supplemental services provisions. It is important to note that the findings presented in this paper do not provide a nationally representative picture of the implementation of the supplemental services provisions, both because the sample is very small and because the sample was purposively selected from states and districts that were considered to be further along than others. The purpose of the study was not to evaluate supplemental services but rather to gain

¹ U.S. Department of Education. Policy and Program Studies Service. *Early Implementation of Supplemental Educational Services Under the No Child Left Behind Act: Year One Report*, by Leslie Anderson and Lisa Weiner. Author. Washington, D.C., 2004.

insights from the early efforts of these states and districts that could assist others in improving implementation of supplemental services.

This paper describes and analyzes the important areas of activity in 2003-04 related to district implementation of the supplemental services provisions of NCLB. Specifically, it describes districts' myriad responsibilities for implementing the supplemental services provisions of NCLB. School districts that have schools that are in their second year or later of improvement are responsible for notifying parents of their children's eligibility to receive supplemental services and for providing parents with adequate information to select providers for their children. The case studies revealed, however, that districts confronted many more challenges in addition to merely informing parents of the availability of services. Moreover, the snapshot of districts taken in 2003-04 revealed that districts varied tremendously by the number of schools they had to work with, the number of providers they had available to students, when they notified parents, and when they began providing services (see Exhibit 1). Accordingly, districts approached the implementation, management, and evaluation of supplemental services in a variety of ways.

District Efforts to Reach Parents

In 2003-04, districts' efforts to inform parents of the availability of supplemental services appeared organized and focused on helping parents understand the services districts were offering them. Most district administrators in the study sample in 2003-04 reported beginning their administration of supplemental services by first contacting all the providers on the state-approved list to determine their availability to offer services in their respective districts. District administrators asked providers to submit a short profile of the type of services they offered, as well as the frequency and duration of those services, the age group providers served, whether they intended to offer transportation (if services were offered outside of the schools), and whether they served the needs of special populations of students.⁶ Comments from administrators in at least one of the nine districts indicated that the provider vetting process went beyond determining whether a provider was "able" to serve the district to which providers offered the services. As one administrator explained, "We looked at enrollment and tried to get a balance at the schools with what [providers] offered. Some providers were selected because they offered more language or math, for example." Such vetting by district staff, however, is not allowable under the statute, according to an August 2004 letter issued by the U.S. Department of Education (Simon and Rees, Aug. 26, 2004). The letter, issued after the data were collected for this study, informs states that approving providers is the responsibility of the state departments of education, and school districts may not alter or add to criteria related to program design.

⁶ Districts collected basic information about provider services because very little, if any, of this information was provided to the districts by the state.

Exhibit 1
Characteristics of Supplemental Services in Sampled Districts in 2003-04

District Name	Demographics ^a	Number of Schools Required to Offer Services	Number of Providers in District	Date of Parent Notification	Date Services Began
Brooktown School District	Large Central City; 80% minority; 27% LEP	24	14	October 2003	December 2003
Plainfield School District	Large Central City; 56% minority; 7% LEP	1	5	May 2003	September 2003
Oakwood School District	Mid-size Central City; 99.4% minority; 1% LEP	20	6	November 2003	March 2004
Sunnydale School District	Large Central City; 91% minority; 2% LEP	42	10	July 2003	September 2003
Emory Public Schools	Urban Fringe of Large City; 23% minority; LEP N/A	3	12	September 2003 (ES) and March 2004 (MS)	November 2003
Springvale School District	Mid-size Central City; 70% minority; 7% LEP	4	12	October 2003	November 2003
Redding School District	Mid-size Central City; 71% minority; 1% LEP	10	6	September 2003	January 2004
Trainville School District	Large Central City; 77% minority; 28% LEP	5	5	September 2003	October 2003
Longwood Public Schools	Large Central City; 90% minority; 43% LEP	104	27	September 2003	January 2004

Once districts collected all the relevant information from providers, district administrators began mailing letters home to parents informing them of the availability of supplemental services. Most of the nine districts in the study sample accompanied those letters with packets of materials that included descriptions of provider services, a selection form for parents to rank their choice of provider (which sometimes included a prepaid envelope for parents to mail their form back to the district—in other cases, parents were expected to either mail the form back on their own, call the district, or call the school), and provider-generated brochures. Some districts even included answers to frequently asked questions among the materials they sent home to parents, as well as checklists for applying for supplemental services and dates when applications and provider selection forms were due back to the district. One

^a Large Central City: Central city of a Metropolitan Statistical Area (MSA) with a population greater than or equal to 250,000. Mid-size Central City: Central City of an MSA with a population less than 250,000. Urban Fringe of Large City: Place within an MSA of a Large Central City and defined as urban by the Census Bureau (Common Core of Data, National Center for Education Statistics, U.S. Department of Education).

district included a set of questions that parents could ask when talking to providers about the services they offered.

In addition to the provider information and materials, most districts in the study sample sent parents a short letter. Less than a page long, these letters were relatively straight-forward, and referenced the availability of “tutorial services” or “extra help” for children in reading and math. Several districts in the study sample did not mention the *No Child Left Behind Act* in the letters they sent home to parents. The following are excerpts from letters to parents sent by three separate districts:

*District 1: I am sending you this letter to strongly encourage you to enroll your child in the Supplemental Services After-School Tutoring. This is a wonderful opportunity for your child to receive extra help and assistance in reading and math. This extra tutorial assistance is offered at **NO COST** to you.*

District 2: We are pleased to inform you that your child has been approved to receive free tutoring services for the 2003-2004 school year. You have the right to choose the tutoring service you prefer for your child. Attached you will find flyers for supplemental service providers who will be tutoring eligible students in the [school district].

District 3: The [DISTRICT NAME] is on the move in addressing improved student achievement and our number one goal is to close the achievement gap and to provide the support necessary to ensure all students have ample opportunities to improve their academic achievement. With this goal in mind, we are pleased to inform you that your child may be eligible for extra academic assistance under the federal law, The No Child Left Behind Act.

Two of the districts lapsed into legislative jargon when describing supplemental services to parents. The parents in one of the districts, in fact, complained that the language of NCLB was inaccessible to them. For instance, terms such as “Supplemental Services” and “Adequate Yearly Progress” did not have much meaning for some parents in this community. The following is an example of a jargon-filled school district letter:

The [DISTRICT NAME] has always worked to provide our students with a positive educational experience. Our district receives funding from many sources, one of which is Title I, Part A, a grant provided by the federal government through the recent legislation, No Child Left Behind. As a requirement for receiving funds under this program each school must meet the guidelines for ‘adequate yearly progress’ in each subject area using a system approved by the [STATE] Board of Education. The Title I program’s assessment of this school indicates that we need to strengthen achievement in the areas of reading and mathematics. As an option of the No Child Left Behind legislation, some students in your school have the opportunity to receive supplemental services. This letter is to inform you that your student has been identified to participate in this program.

As the parent coordinator at one of the high schools where students were eligible to receive supplemental services explained: “[It’s a problem because] a lot of times parents are afraid to

say that they don't understand the jargon of the law." A parent of an eligible student had this to say about the letter:

The language of the parent letter is not something that parents can easily understand.... There was a good amount of confusion.... It was a very lengthy letter.

In addition to the print materials districts sent home to parents, other efforts were made to reach parents. Indeed, districts reported being eager to reach parents. For example, one district held two provider fairs at the schools required to offer supplemental services and sent fliers and other reminders home starting in the spring on at least five separate occasions. The principal reported that staff visits were also made to homes to encourage parents to enroll their children in supplemental services. Another district placed an announcement about the availability of tutoring services in the local newspaper; the announcement ran for two days. A third district sent fliers and sponsored television and radio ads to advertise a provider fair. A fourth district decided to call eligibility for tutoring "scholarships" because it had learned from another district that this approach gave supplemental services a more positive spin and might yield higher participation rates. One district's efforts to reach parents, however, seemed well above the norm among the nine districts included in the study sample. This district described its outreach process as encompassing nine steps, each of which suggested a good deal of time, thought, and energy was devoted to the task of reaching parents (see box, next page). This district served a total of 336 students or 28 percent of the eligible students it had the funding capacity to serve.

Contacting and communicating effectively with parents about the availability of supplemental services challenged most school districts. Although districts generally thought that they were doing a good job informing parents of the availability of supplemental services, some providers, teachers, and principals disagreed. In one district, for example, some teachers and principals said that the packet of materials the district sent home to parents was too complicated and confusing to be helpful. As one principal explained:

The packet was overwhelming. Parents really didn't understand all of the information until teachers really made the connection. Teachers would call home and explain to parents that [supplemental services] would benefit them if they attended.... [Without the phone call] they just saw this big bulky packet. . . The language was really difficult....

Similarly, another district reported that while parents received ample detailed information on supplemental services, many simply did not read it. According to the Title I director, parents and others suggested that in the future "[W]e [should] do sound bites, billboards, and radio ads, something quick to get away from written things." She continued: "We want to find out how to get good information to parents without overwhelming them. We did not do a good job to make sure they were not overwhelmed...."

One District's New Steps for Reaching Parents

Step 1: Assistant superintendent sends a letter home to parents informing them of the availability of supplemental services.

Step 2: The district sends a brochure home to parents about provider services along with a business reply postcard that allows parents to check which provider they have selected. Information about each provider includes answers to questions such as the following: (1) What programs are available for my child? (2) When and where will services be provided? (3) How often will services be provided? (4) What kind of experience does this provider have? and (5) what is the demonstrated effectiveness of the provider?

Step 3: Elementary schools send home fliers about supplemental services along with student report cards.

Step 4: School newsletters will contain information about supplemental services each time they are sent home.

Step 5: The district mails monthly postcards home to parents.

Step 6: School principals discuss supplemental services on the radio.

Step 7: School principals, Title I teachers, and counselors contact parents about supplemental services.

Step 8: The district's Title I parent liaison calls every parent and informs them of the availability of supplemental services.

Step 9: Churches in the school attendance areas are sent information about supplemental services.

Schools in another district complained that they did not receive enough information from the district about providers and, as a result, they were unable to help parents when they called the school to inquire as to which provider would be best suited to the needs of their child. As one principal explained:

The one-page description of providers wasn't sufficient—it gives you basic information... a one-page flier telling you the services of [providers]. They all sound the same and you don't know one from the next and don't know who's good and who's not.

Districts in the study sample also cited the problem of communicating to parents which students were eligible for services. As one district administrator explained, it was difficult for parents to understand that their children did not qualify for services because they did not attend a school identified for improvement, or they were not eligible for free or reduced-price school lunches. Other parents wondered why they received a letter when their child was doing well in school.

Targeting Students for Services

Seven of nine districts in the 2003-04 sample offered supplemental services to all students from low-income families in schools required to offer supplemental services. In the previous year, the majority of case study districts had also considered student achievement—in

addition to whether a student was from a low-income family—when offering services. Three of the five districts that participated in this study in 2002-03 and 2003-04 changed their targeting procedures as a result of low rates of participation in supplemental services in 2002-03 (see Exhibit 4). That is, several district administrators explained that opening the services up to any student from a low-income family who attended a school required to offer supplemental services might raise levels of participation in supplemental services. By contrast, in 2002-03, several districts thought it was necessary to prioritize students for services because they believed that supplemental services would be so popular among families that districts would not be able to serve all eligible students based solely on poverty status. In practice, supplemental services did not prove to be as high in demand as districts had anticipated in their first year of implementation. And district experiences in 2003-04 suggest that targeting is again unnecessary. For example, one district began supplemental services in 2003-04 by prioritizing students for services based on family income and academic need. As the supplemental services administrator explained, the district had determined how many students it could serve based on the per-pupil allocation (as defined by the state) divided into an amount equal to 20 percent of the district's Title I allocation:

[We didn't] know if we would be able to serve all the kids, [so we] prioritized the kids by test score in case everybody signed up. [However, we] only had 42 kids whose parents said they wanted to receive services.

The district administrator went on to explain that because so few parents enrolled their children in supplemental services when the initial letters went out, the district eventually opted to send letters to all low-income parents whose children were attending schools required to offer services.

District Relationships with Supplemental Service Providers

District relationships with supplemental service providers varied. Among the districts included in the study sample in 2003-04, many were skillful in developing provider contracts and, in many cases, had put in place procedures for improving their efficiency in writing, reviewing, revising, and approving provider contracts.

In 2003-04, districts in the study sample were adept at entering into contracts with service providers. Many districts used boilerplate contracts for providers that they created—and vetted—in 2002-03. Accordingly, no confusion or consternation about creating provider contracts was evident in 2003-04. Among the three districts in the study sample that provided supplemental services for the first time in 2003-04, all were using contract templates or samples they had obtained from their state education agency or from other districts. Most of the districts used one standard contract for all providers; one district, however, used various formats and structures for its contracts for providers, appearing to simply amend contract templates received from the various providers rather than working from an original contract designed by the district.

Most district contracts with service providers, while varying in length, contained much the same content, referenced many of the same issues, and included specifications for each of the following:

Number of hours of tutoring services for each student
Duration and frequency of tutoring sessions (i.e., number of sessions per week)
Maximum dollar amount paid per student served
Type of instructional program (e.g., reading or math instruction)
Provision of services on-site vs. off-site
Administration of pre- and post-tests to students
Student attendance reports delivered monthly to the district (usually as a condition for payment of provider invoices)
Student progress reports (delivered to parents and to the district at regular intervals, usually every four to six weeks)
Annual program evaluation report
Agreements regarding student goals and progress (required in eight of nine district contracts)
Termination of services
Liability insurance
District responsibilities (e.g., identify eligible students and deliver list to providers four to six weeks before the provision of services; provide a contact person for providers; provide and disseminate student contact information, grades, test score data, etc.)
Terms of payment or compensation

Finally, most district contracts were accompanied by a series of attachments that amounted to examples of forms (e.g., student attendance forms, student agreement forms, etc.) that providers were required to complete periodically. One district, however, made contract approval contingent upon providers submitting additional information, including background check clearance forms; results of TB tests; signed building rental lease agreements if they were using district facilities; a business license to work in the district; transportation schedules for students receiving tutoring services; and information on the square footage of the instructional classrooms providers intended to use when working off-site. Another unique aspect of this district's provider contracts was the requirement that providers offer transportation to all students receiving supplemental services. Moreover, transportation had to be provided by "a licensed company approved by the district." Every supplemental service provider ultimately contracted to use the same bus services that the district used. While districts are allowed to impose reasonable administrative and operational requirements through agreements with providers that are consistent with requirements imposed generally on the districts' contractors, a letter from the U.S. Department of Education (Simon and Rees, Aug. 26, 2004)—issued after the study data were collected—makes clear that districts are not allowed to impose conditions on providers related to program design. In addition, any such requirements should not limit educational options for parents.

Although most districts seemed skilled at writing provider contracts, the time it took to finalize the contracts in 2003-04—even when working from well-vetted boiler-plate templates—was significant. One district administrator reported that contract development continued to be a long and difficult process. "I had to work with the providers for about two months.... There was lots of e-mailing. We need software to track the changes to save time. I worked on the contracts late at night...2 a.m., 3 a.m." This Title I director also noted that she

even occasionally called upon the knowledge and expertise of her husband, an attorney, to help her. The burden was overwhelming for her. “During the contract period I’m sure I worked all day every day for a couple of weeks...five hours each night for 10 nights straight.” She noted that she spent more than 50 percent of her time on supplemental services and, as a result, she was “fatigued” and unable to take care of the “details in my regular Title I duties.” One source of the problem was that, in cases in which the providers were subsidiaries of large corporations, the contract negotiations involved dealing with additional people in cities far away. These lengthy negotiations slowed the contracting process and made it more protracted.

In two other districts, the contracting process was slowed dramatically by the local school boards involving themselves in the provider vetting process. In one district, for example, the providers were vetted by three different committees of the local school board. The goal of each committee meeting was to ensure that providers met certain district and state regulations such as being registered with the state fire marshal and having completed background checks for all of their employees. Moreover, these meetings were open to the public and broadcast on public access television. The district saw the meetings as “another opportunity” for parents to learn about how providers could help their children by offering tutoring services. Nevertheless, it delayed the contract approval process—and therefore the provision of supplemental services to students—by several months. While, as noted above, districts may impose reasonable operational and administrative requirements through their agreements with providers, such requirements should not undermine the parents' opportunity to select the most appropriate provider for their children from among providers approved by the state to offer services in the district or area where the child lives.

Most case study districts had begun to put in place systems for communicating with providers. Among four of the five districts that participated in the study in 2002-03 and 2003-04, there was an increase in the number of providers offering services (see Exhibit 2). Accordingly, there was a more pressing need among those districts to develop systems to communicate with providers. In 2002-03, in fact, many districts worked with no more than one provider. In 2003-04, however, districts were approaching their supplemental services work quite differently. These districts had learned from their experience implementing supplemental services in the previous year that managing relationships and communicating directly with providers was necessary to ensure that services ran smoothly. For example, several district administrators said they kept in regular contact with providers by telephone and e-mail and that they kept records on provider invoices and mapped those against the number of students served. Indeed, an indicator of districts’ commitment to improving the management of supplemental services was that at least three of the nine districts in the study sample had found ways to fund a supplemental services coordinator position in their district (using funding sources other than Title I).

The need for additional district staff to assist with supplemental services was evidenced by the provider coordination and management problems and misunderstandings that continued to frustrate some district implementation efforts. For example, one district administrator told the story of a provider going door-to-door in the community trying to recruit students. When word got back to the district, the provider was told that all recruitment efforts had to go through the district in order to ensure that parents know all the provider options

Exhibit 2
Changes in the Number of Schools and Providers, and the
Timing of Supplemental Services in Sampled Districts Between 2002-03 and 2003-04^a

District Name	Number of Schools Required to Offer Services		Number of Providers in District		Date of Parent Notification		Date Services Began	
	2002-03	2003-04	2002-03	2003-04	2002-03	2003-04	2002-03	2003-04
Brooktown School District	3	24	13	14	September 2002	October 2003	November 2002	December 2003
Plainfield School District	3	1	4	5	August 2002	May 2003	January 2003	September 2003
Sunnydale School District	59	42	6	10	November 2002	July 2003	January 2003	September 2003
Redding School District	12	10	3	6	August 2002	September 2003	January 2003	January 2004
Trainville School District	5	5	12	5	August 2002	September 2003	April 2003	October 2003

available during the school year. In this case, the district went beyond its authority in telling the provider that all recruitment efforts had to go through the district. According to U.S. Department of Education Non-Regulatory Guidance on supplemental services (Aug. 22, 2003, Item F-10), “Providers are allowed to market their services to members of the community or to provide general information to the public about the availability of supplemental services. LEAs may not restrict them from doing so.”

Another district found that some students were receiving services from two separate providers, one providing services three days a week and the other providing services on the other two days. This example made it clear that the district needed to closely monitor provider attendance lists before paying for services. An administrator in another district said she did not feel she had enough time or support to manage the providers and the supplemental services:

Supplemental services is labor intensive—not hard—but intense... parents are always calling with questions, providers are calling with questions. [I spend time] checking to make sure whether the providers [are showing up] or not, checking with principals, and [making sure] invoices and progress reports are done correctly.

Although monitoring providers is a state responsibility, district administrators perceived a need to collect data on provider performance at the local level as well, both to assist the state in its monitoring of providers and to ensure compliance with the terms of the contracts they had negotiated with providers. Most districts were familiar with the requirement that providers be removed from state lists if they fail to contribute to increased student proficiency for two consecutive years. Although the states generally had not formalized procedures for evaluating provider performance, there were indications that districts would have

^a Three of the nine case study districts were providing supplemental services for the first time in 2003-04. Accordingly, these districts are not represented in this table because there were no comparative data available for the 2002-03 school year. A fourth district offered only summer services in 2002-03.

a role in collecting the data to be used in these evaluations. For instance, one state's application noted that state monitoring would occur in cooperation with districts. Several districts wrote into provider contracts that providers must share any data they collect from their programs with the state. In addition, at least two districts planned to survey parents and school staff at the end of the tutoring period to gauge their level of satisfaction with the supplemental services provided. One of these districts, for example, intended to use the survey results to help determine whether providers were abiding by the stipulations of their contracts with the district. The parent survey, for example, asked parents whether the provider had "given you and your child regular feedback on his or her learning." The other district planned to administer a survey to parents and schools at the end of the 2003-04 school year to evaluate provider performance. The surveys were going to ask respondents about provider dependability, student engagement in provider services, and parent satisfaction with provider services.

In 2003-04, at least one district had teachers, principals, and even parents express concern over the impact providers would have on student performance. As one teacher explained, "It is hard to say whether or not 30 hours of extra tutoring will really be enough to advance a population of students that are highly mobile and ELL from not proficient to proficient." She believed that monitoring providers should focus not on whether students succeed or fail, but on whether services were provided. Nevertheless, providers recognized that a provider performance measure from the state was not long in coming and were attempting to do what they could to prepare for it. Indeed, one provider said that he knew that if his program were to receive an unfavorable performance report for two consecutive years, then the program would be removed from the list of state-approved providers. He added: "That's why we do pre- and post-testing to show what we have been doing [especially] given that we only have a conditional, one year [contract with district]."

The Role of Identified Schools in Implementing Supplemental Services

In 2003-04, many districts in the study sample involved schools directly in the process of enrolling students in supplemental services. In every case but one, district administrators described relying heavily on school principals, teachers, and staff to help implement supplemental services. One district reported that the teachers and principals in all the identified schools played a major role in getting students to enroll in supplemental services. As the district supplemental services coordinator explained: "The principals have done their own advertising for the program.... They have called parents whose kids really need help." Teachers said they were encouraged by the principals to call the parents of students who they believed could benefit from supplemental services. An administrator in another district reported that teachers were instrumental in explaining the various programs to parents and were relied upon by many:

The teachers were available to help explain the various choices and to help parents fill out the necessary forms. When parents would ask 'What is my child having problems with?' or 'Which [provider] is going to help my child with word problems?' the teachers were available to help.

Several teachers in this district said that many parents were persuaded to sign their child up for services simply because their child's teacher was the one providing the services. In fact, many parents in this district apparently selected the district as their preferred provider simply because so many of the identified school's teachers were employed as tutors in this program. Another teacher explained it this way: "When teachers are tutors, the parents are just more comfortable."

In other districts, many of the principals in the identified schools said they helped with outreach efforts by calling the parents of students they believed could benefit from the services. In one district, the principals explained that the district did not have enough staff to implement supplemental services and that they tried to fill in as they could in contacting parents. In another district, the school principal summed up the value of having schools involved in reaching parents: "If it weren't for teachers at that school calling parents, the numbers [of students participating in supplemental services] wouldn't be so high..."

The school staff members in yet another district described themselves as having an informal responsibility for recruiting students for services. That is, they received a list of priority students from the district, and they would sometimes make calls and encourage parents to enroll. One principal said, "What I believe happened is the teachers made mention of [supplemental services] to the parents of students who they felt really needed services." However, schools in this district said there was no formal system in place for outlining schools' roles in identifying and recruiting students for services. One principal explained her school's level of involvement in supplemental services recruitment this way:

When parents had questions [about supplemental services], they would call us and we would do our best to answer questions. We mostly referred them to the providers because they knew [best] what services they were providing. We only had limited information. One thing we did do was, if a provider said they could only come if at least 10 students signed up, as I talked to parents, I would say this provider will come for this many and this is how many are interested. So I would give these folks a call—not trying to recommend anyone but just trying to help reach the numbers.

Many districts in the 2003-04 study sample also involved schools in the recruitment process by providing them with sample letters to personalize and send home to the families of students who were eligible to receive supplemental services. In addition, schools in several districts held parent meetings to discuss the availability of supplemental services and to describe the services providers were offering. Some schools hosted provider "fairs" to give parents an opportunity to hear from the providers directly about the services they offered. Indeed, administrators in at least two districts explained that it was the schools, not the district, that were responsible for coordinating forums in which providers could give presentations to parents on the kinds of services they offer to students. Moreover, in one of these districts, the parent coordinators at the identified schools called the parent of every eligible student to inform them of their child's eligibility and to explain supplemental services in terms that parents could understand. Using the school-based Title I parent coordinators or district Title I Parent Liaisons to contact parents occurred in at least two districts in the study sample. In both these districts, rates of participation in supplemental services were relatively high.

The practice of involving schools more centrally in the recruitment process had some unexpected consequences. One district, for example, wrote a grant to the state for funding to cover the cost of a supplemental services coordinator to work directly at the school where supplemental services were offered. As the district Title I director explained:

The program was putting an extra burden on the principal and staff, so I wrote a state grant to get a supplemental services coordinator. We were really concerned about the drain of energy [from the school as a result of implementing this program].... The coordinator needed to be someone who is not a full-time teacher at the school.

In another district, principals and teachers had a significant amount of control over parents' selection of providers. For example, one elementary principal described screening 20 providers and ending up with only two who were willing to provide services at the school and who passed muster with him—people he would trust with the students. Another principal said the following about his role in the provider selection process: "I pretty much chose the providers because I had the time to call them. I knew our needs and looked at who had the experience and infrastructure to do this." However, principals determining whether and when providers can present their services to parents at a provider "fair" and whether they'll make space available to providers may result in the elimination of much of the "choice" afforded parents in their selection of providers.

Some districts in the study sample handed over control of the student selection process to the schools, permitting principals and teachers to determine the eligibility of students—beyond low-income status—for supplemental services. An administrator in one district explained that it was up to the principals' discretion to recruit students. The principals relied on teachers to determine which students needed services the most. Teachers were encouraged by their principals to make calls to parents of students who they thought would greatly benefit from supplemental services. One teacher explained, "I called select students to make sure they understood they have this opportunity." Similarly, teachers in another district played a significant role in ensuring that the most academically needy students were signed up by their parents to receive supplemental services. "The list [of providers] went out to everyone but if the parents did not select anyone, we contacted them if we thought the kids needed it," explained one teacher.

In another district, teachers in identified schools explained that they put together a list of students getting D's and F's. The parents of those students received a letter from the principal and the grade-level teachers saying that their child must attend tutoring. This district's effort to target services to low-achieving students was reasonable, but according to U.S. Department of Education Non-Regulatory Guidance on supplemental services (Aug. 22, 2003), the option for these students to participate should have been the parents' choice and not a requirement. Another teacher said that although only about 12 percent of parents attend conferences, "We make lots of phone calls and tutoring is always brought up...." School staff in some districts said they wanted to play a bigger role in determining the eligibility of students. As a principal in one district explained: "We would like to have input about who are the most at-risk and educationally disadvantaged [students] and make sure that they're contacted first." Despite the desires of school staff to identify the students whom they deem most in need of supplemental services, the law makes clear that students can only receive supplemental services if they are

from low-income families and attend a school that has been identified for improvement for two or more years.

In 2003-04, districts increasingly relied upon principals and teachers to help coordinate the implementation of supplemental services. Principals in some districts noted the fact that supplemental services often required that they get involved in the logistics of the services, including making sure space was available for providers and that parents turned in their permission slips for students to receive services. A principal in one district, for example, complained that the parents didn't understand that permission forms were supposed to be mailed back to the district, so the school collected them and forwarded them to the district. In another district, a principal said she had to adjust the schedule of the administrative staff to accommodate supplemental services and ensure that the school building was secure. In 2002-03, the principal explained, the administrative staff schedule was 11 a.m. to 4 p.m., while in 2003-04, the schedule was from noon to 5 p.m. The supplemental services administrator in this district understood why principals might be a bit frustrated with them: "The biggest complaint from schools is the additional work hours for principals and administrators. Their paperwork needs to be done after school, but the burden is placed on them to oversee the after-school component as well." Still, some districts had schools in which teachers did not know many of the details about what takes place during tutoring sessions or which students participate in the various after-school programs available at the school. Nevertheless, most agreed that the role of schools in helping to coordinate supplemental services was critical. One provider stressed the importance of a school embracing supplemental services:

The school plays a key role. If [it doesn't] embrace the program with rooms, leadership, and resources, there is no way it can be successful. It has to be a partnership. In the schools that have embraced it, attendance is high. Principals know what works best with their students. I wish they would share some of that information with us.

District Funding for Supplemental Services

NCLB establishes a joint funding mechanism for supplemental services and Title I choice-related transportation of an amount equal to 20 percent of a district's Title I, Part A, allocation, before any reservations. This means that the amount of funding that a district must devote to supplemental services depends in part on how much it spends on choice-related transportation. However, if the cost of satisfying all requests for supplemental services exceeds an amount equal to 5 percent of a district's Title I, Part A, allocation, the district may not spend less than that amount on those services. NCLB also sets the per-child cost for supplemental services as the lesser of either the district's per-child allocation under Part A of Title I or the actual cost of the services.

Districts varied widely in the percent of their Title I, Part A, allocation that they opted to set aside for supplemental services. As shown in Exhibit 4, the percent of Title I (or other) funds that districts set aside in 2003-04 for supplemental services ranged from a minimum of 2 percent to 21 percent. According to NCLB and subsequent guidance from the U.S. Department of Education, districts must spend an amount equal to 5 percent of their Title I allocation (and up

to 20 percent) to fund supplemental services provisions of NCLB, unless demand for services requires less funding. In the case of two of the districts that set aside less than 20 percent of their Title I allocations, district administrators explained that they had set aside enough resources to meet the needs of all the eligible students enrolled in the identified schools. In the four other districts that set aside less than 20 percent of their Title I allocation, all four administrators explained that they based their Title I set aside on the previous year's demand for both choice-related transportation and supplemental services. This approach, however, demonstrates that at least some districts were determining funding needs based not on actual demand for choice-related transportation and supplemental services—which the legislation says districts must do—but on anticipated demand. This practice of setting aside Title I resources before gauging demand is likely to bring districts up short if the demand for services ever exceeds the amount the districts reserved. As Exhibit 3 demonstrates, if three of the nine districts had set aside the full 20 percent of their Title I allocation, they would have had the capacity to serve far greater numbers of eligible students if they did not have costs associated with choice-related transportation.

The average district per-pupil expenditure for supplemental services among the nine districts included in the study sample was \$1,408 in 2003-04 (see Exhibit 3). Among the five districts included in both the year one and year two samples, the average per-pupil expenditure for supplemental services increased from an average of \$967 per student in 2002-03 to an average of \$1,280 per student in 2003-04 (see Exhibit 3). This represents an average increase of about \$300 per student. The increase in the average per-pupil expenditure may be the result of districts' better understanding—as a result of state and federal guidance—of how the costs of supplemental services are meant to be distributed among students. That is, in 2002-03, few districts in the study sample had a strong grasp of their capacity to serve eligible students based on the maximum amount they were required to spend on supplemental services. Rather, districts in the study sample looked at their maximum required amount for spending on supplemental services and assigned students to provider services until the funding was expended (none of the districts reached this limit). In 2003-04, every district knew that it could estimate the number of students it could serve by calculating 5-20 percent of the district's Title I allocation and dividing this amount by the maximum required per pupil expenditure (the latter being the district's Title I allocation divided by the Census poverty count).

In 2003-04, in six of the case study districts, more students were eligible for supplemental services than the number to which the district could provide services with the maximum required amount of funding. Indeed, in Oakwood School District, for every nine students who were eligible to receive supplemental services, the district had the funding capacity to serve one student. The remaining three districts could have provided supplemental services to all eligible students with the maximum required amount of funding (Exhibit 4). Two of these districts (Trainville and Plainfield), because they had very few schools identified for improvement, had significant excess capacity to serve eligible students.

Exhibit 3
Districts' Capacity to Serve Eligible Students in 2003-04

District Name	Criteria for Prioritizing Students for Services	Maximum Possible Expenditure Per Student	Percent of Title I Funds Set Aside for Supplemental Services ^a	Number of Eligible Students	Number of Students Receiving Services	Percent of Eligible Students Served	Number of Eligible Students District Had Capacity to Serve Based on Percentage of Title I Allocation <i>Actually Set Aside</i>	Number of Eligible Students District Had Capacity to Serve IF it Set Aside and Spent an Amount Equal to the Full 20% of their Title I Allocation	Percent of Eligible Students Served Based on District Funding Capacity (i.e., setting aside an amount equal to 20% of Title I Allocation)
Brooktown School District	Students from low-income families	\$1,264	20% (\$1,600,000) +\$500,000 of other district funding	12,918	1,787	14%	1,661	1,661	108%
Plainfield School District	Students from low-income families	\$1,197	2% (\$418,950)	356	301	86%	350	N/A: District had capacity to serve ALL eligible students without setting aside 20 percent	86%
Oakwood School District	Prioritized based on income and achievement ^b	\$1,963	21% (\$2,275,178)	9,781	1,097	11%	1,159	1,103	99%
Sunnydale School District	Students from low-income families	\$1,212	15% (\$5,000,000)	40,000	3,400	9%	4,125	5,500	62%
Emory Public Schools	Students from low-income families	\$1,520	10% (\$275,528) +5% of state funding	650	153	14%	272	363	42%
Springvale School District	Students from low-income families	\$1,449	15% (\$3,003,077)	1,199	336	28%	2,073	N/A : District had capacity to serve ALL eligible students without setting aside 20 percent	28%
Redding School District	Students from low-income families	\$1,377	6% (\$712,000)	5,264	382	7%	517	1,724	22%
Trainville School District	Prioritized based on income and achievement ^c	\$1,340	10% (\$25,000,000)	3,659	472	13%	18,657	N/A : District had capacity to serve ALL eligible students without setting aside 20 percent	13%
Longwood Public Schools	Students from low-income families	\$1,352	20% (\$60,000,000)	190,000	19,000	10%	44,379	44,379	43%

^a All the districts in the study sample elected to set aside a percentage of their Title I allocation for choice-related transportation and supplemental services, but districts have the option of setting aside funds from sources other than Title I.

^b Oakwood School District targeted services to low-achieving students even though the district had not reached its funding capacity to serve all students from low-income families. By identifying only low-achieving students from low-income families for services, the district's count of the number of eligible students was 1,159 rather than 9,781. Of these 1,159 students, 95 percent received supplemental services (compared with 11 percent of all low-income students).

^c Trainville School District also targeted services to low-achieving students even though the district had not reached its funding capacity to serve all students from low-income families. By identifying only low-achieving students from low-income families for services, the district's count of the number of eligible students was 2,000 rather than 3,659. Of these 2,000 students, 24 percent received services (compared with 13 percent of all low-income students).

Exhibit 4
Ratio of Eligible Students to Students Districts
Had Funding Capacity to Serve in 2003-04

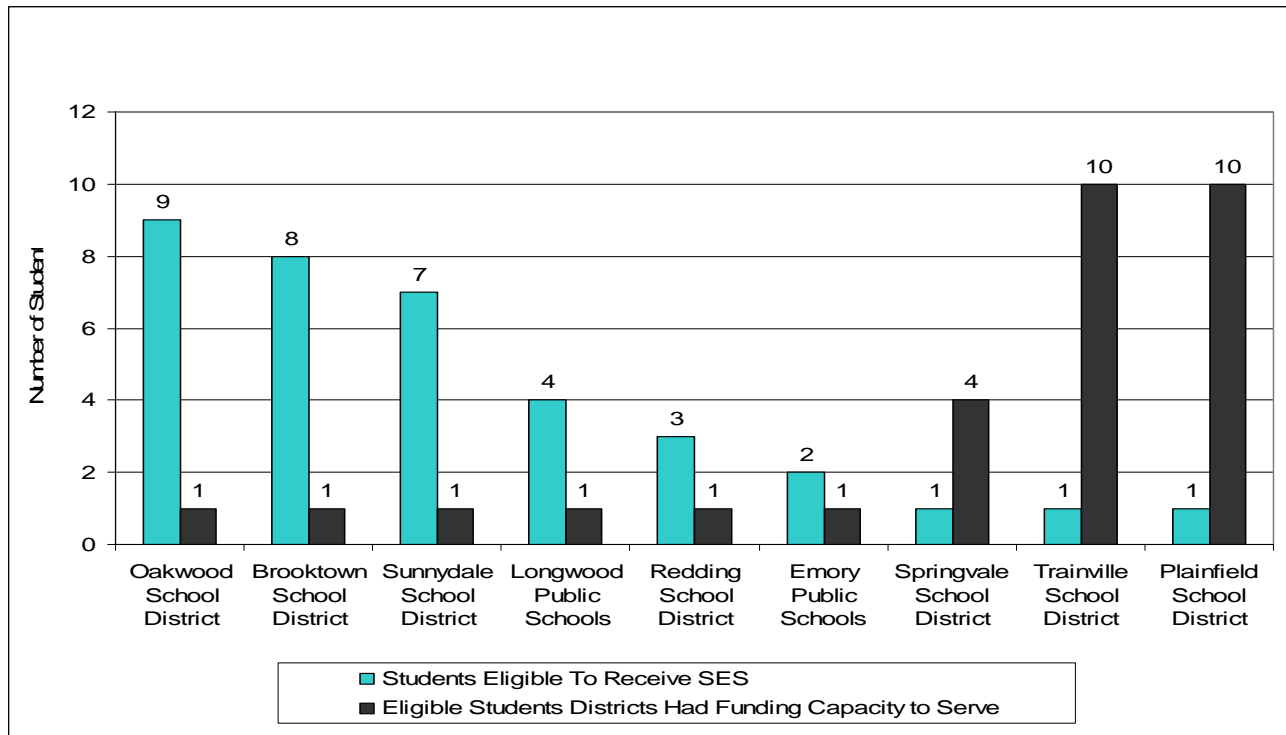


Exhibit reads: For every nine students eligible for supplemental services in Oakwood School District, the district had the funding capacity to serve one.

Several sampled districts expressed concern about the administrative costs associated with implementing supplemental services. District administrators explained that there were still costs associated with the mailings to schools and parents, as well as costs associated with working with the providers. Although districts may use Title I administrative funds to pay for the implementation of supplemental services, the cost of these implementation activities is not insignificant. In one large district, the annual cost of producing and mailing the choice and supplemental services letters was \$250,000. Another large district reported spending more than \$100,000 in postage on the supplemental services and choice letters. An administrator in yet another district noticed that the copying costs to administer supplemental services were immense: “We are noticing that the volume of copies needed for recording data, student work, and communication to parents is depleting our copying capacity each month.” Although districts may use Title I administrative funds to pay for these activities, there are also the legal costs associated with writing provider contracts was mentioned again as a significant expense to districts. Another district complained that the time required to implement supplemental services takes district staff away from their regular duties. For example, the Title I literacy coach in one district spends half of her time on supplemental services, and this detracts from the time she can spend in schools that need her services. As has already been mentioned, districts continue to need additional staff to manage implementation of the supplemental services provisions. When asked about the administrative costs associated with supplemental services, the Title I director in one district said the following:

[Supplemental services] is mammoth. Last year it was my baby. It is very, very time consuming. It encompasses a lot of time. For one person with other responsibilities, it is very hard to do, especially in large systems with this many children, providers, principals, and buses. There are a lot of complaints—providers complaining, schools complaining, parents complaining.... I assigned it to [another staff member] who says it could be a full-time job by itself. Even with her being responsible, still she and I have to collaborate so it takes time. Not a day goes by that I don't receive at least five calls [about supplemental services]. Some calls come from parents who just heard about [supplemental services] or from a principal who is upset with a provider or from a provider who is upset with a principal.

Student Participation in Supplemental Services

Student participation rates in supplemental services varied across the districts included in the study sample. In most districts, participation rates did not exceed the number of students the districts could serve with the maximum amount they were required to spend on supplemental services. In six districts, participation rates were between 13 and 62 percent of the students the districts could serve with the maximum required amount of funding. One of these districts went to great lengths to recruit parents and sign students up for services and reached a participation rate of only 28 percent. The other three districts provided supplemental services to 86 percent or more of the students they could provide services to with the maximum amount they were required to spend on supplemental services and one of these three districts (Brooktown School District) went beyond its funding capacity to serve an additional 126 eligible students who requested services in 2003-04 (See Exhibit 5).

Looking at participation rates in terms of just the number of students eligible to receive supplemental services—regardless of the number of students the district had the funding capacity to serve—eight of the nine districts had participation rates of between 7 and 28 percent. In one district, 86 percent of eligible students participated in supplemental services.

Among the districts with less than 50 percent participation, several explanations were offered as to why districts' participation levels in supplemental services were not higher. Districts reported that some students did not participate in supplemental services because they were achieving at proficient or advanced levels in reading and math and did not need the service. Districts reported that some students may have needed the services but had family responsibilities that precluded them from staying after school. Districts also reported that students had parents who, because of their work schedules, could not pick their children up after school, and the regulations specifically prohibit districts from counting the costs of transportation for supplemental services toward the minimum amount they are required to spend on choice-related transportation and supplemental services.⁷ Parents offered several reasons their children were not enrolled in supplemental services: they found other after-school options more accessible; they thought their children had sufficient amounts of assistance from the regular

⁷ However, districts may, if they choose, provide transportation for supplemental services and not count it against the 20 percent requirement.

after-school program or tutoring services offered by the classroom teacher; or they wanted their children to participate in other recreational or church-based activities after school.

Exhibit 5
Rates of Student Participation in Supplemental Services in 2003-04, by
Percent of All Eligible Students and by Percent of Eligible Students
District had Funding Capacity to Serve

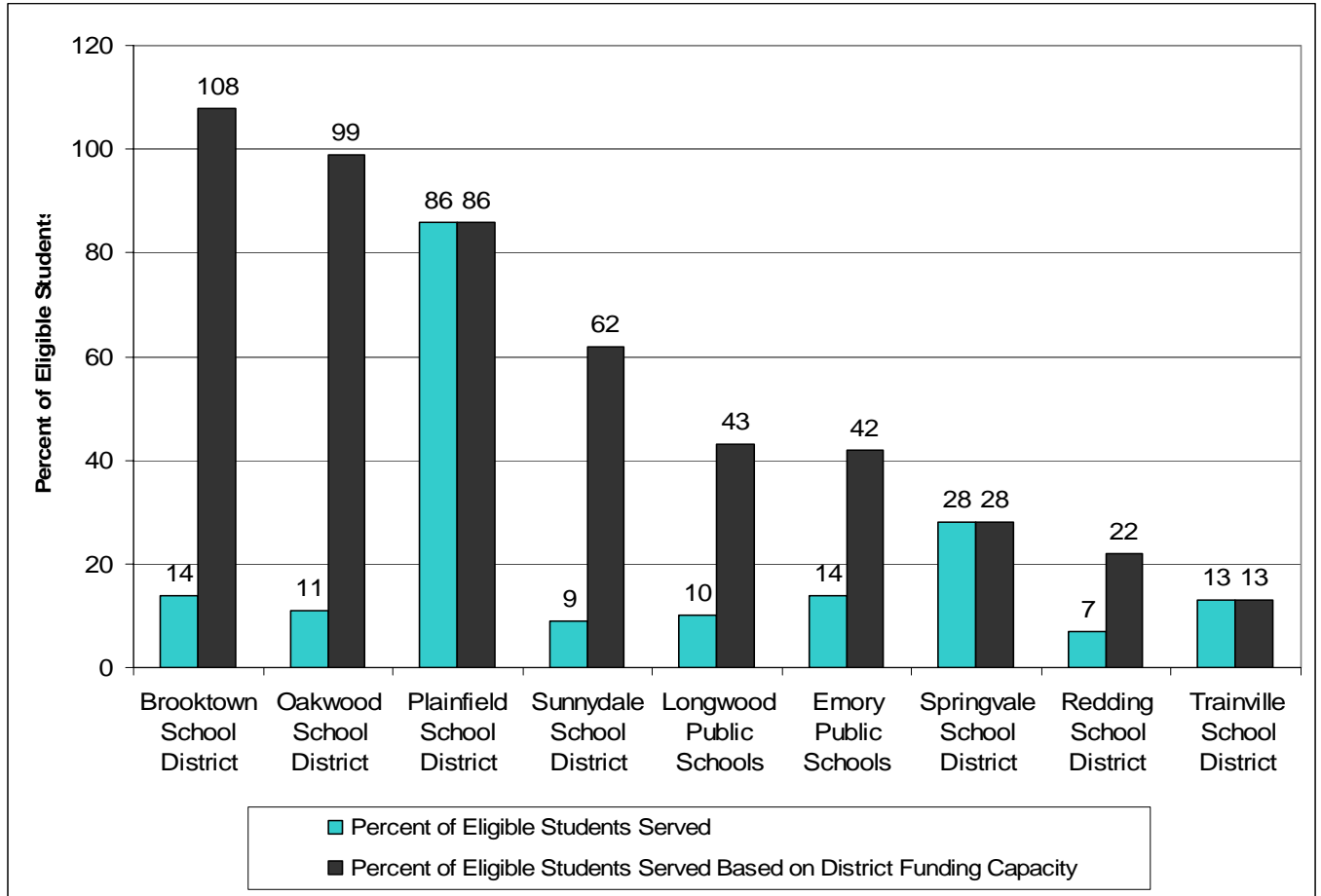


Exhibit reads: In 2003-04, Brooktown School District provided tutoring services to 14 percent of all students who were eligible to receive supplemental services. However, based on the funding requirements for SES—setting aside an amount equal to 20 percent of its Title I allocation divided by the maximum required per pupil expenditure—Brooktown served 108 percent of the eligible students—or 126 more students than it had the funding capacity to serve.

Nevertheless, the case study districts were largely embracing supplemental services. Indeed, the superintendent in one district expressed strong commitment to supplemental services as a way to help low-achieving students and explained that many steps had been taken to promote implementation in the district:

We took that [supplemental services] provision seriously. When I first checked with [my staff], only 11 percent of eligible students were participating—that was unacceptable. I convinced the staff to get the parent, student, and provider connected—some say I ask for the impossible. The focus is not compliance; you can comply [with NCLB] and still have few participants. I want higher numbers participating. We need to do things differently. This is an opportunity to do something for the forgotten kids of [this district]—their parents can't provide this—we are improving learning for the neediest [students].

Both the number and percent of eligible students served varied across the five districts included in the study in both 2002-03 and 2003-04. Three of these five districts included in both years of the study changed their criteria for targeting students for supplemental services between 2002-03 and 2003-04 (see also Exhibit 6). In addition, changes in the number of eligible schools increased the number of eligible students dramatically in two districts and, to a smaller extent, in a third district. A fourth district had virtually no change in the number of eligible students, and a fifth district experienced a substantial decline. The two districts with the most dramatic

Exhibit 6
Changes in Supplemental Services Eligibility, Spending, and Participation
Between 2002-03 and 2003-04, by District^a

District Name	Criteria for Prioritizing Students for Services		Per Pupil Expenditure for Services		Number of Eligible Students		Number of Students Receiving Services	
	2002-03	2003-04	2002-03	2003-04	2002-03	2003-04	2002-03	2003-04
	Brooktown School District	Prioritized based on income and achievement	Students from low-income families	\$950	\$1,264	900	12,918	138
Plainfield School District	Prioritized based on income, grade-level, and achievement	Students from low-income families	\$1,036	\$1,197	973	356	397	301
Sunnydale School District	Phased in based on school and student performance	Students from low-income families	\$850-\$1,000	\$1,212	4,500-6,000	40,000	1,900	3,400
Redding School District	Students from low-income families	Students from low-income families	\$986	\$1,377	5,292	5,264	326	382
Trainville School District	Prioritized based on income and achievement, but served all who requested services	Prioritized based on income and achievement, but served all who requested services	\$940	\$1,340	2,600	3,659	510	472

^a Three of the nine case study districts were providing supplemental services for the first time in 2003-04. Accordingly, these districts are not represented in this table because there were no comparative data available for the 2002-03 school year. A fourth district offered only summer services in 2002-03.

increases in the number of eligible students also reported large increases in the number of students served; the other districts reported small increases or declines.

Conclusions

After nearly two full years, there were signs that the case study districts had overcome some of the initial trials associated with getting a new set of services up and running. There was ample evidence that districts had learned from their experience: some of the challenges faced with respect to identifying eligible students and notifying parents were not as serious for districts included in the study sample in 2003-04, compared with the set of districts in the sample in 2002-03. Moreover, many districts had developed systems and methods for streamlining operations and procedures so as to simplify their work and to provide supplemental services to families sooner. Moreover, districts achieved the ordered inclusion of schools in the work of implementing, coordinating, and monitoring supplemental services. As districts move forward, however, the following challenges remain:

Increasing participation rates: Some districts had undertaken extensive and imaginative efforts to enroll students in supplemental services, with only moderate increases in participation rates to show for it. Districts likely will need to step up their outreach efforts as well as develop more effective ways to communicate with parents about services if they are to reach higher participation rates. Outreach should become easier for districts as providers become established in the communities they are trying to serve and as they develop a positive reputation with parents. Allowing providers to use school facilities appears to help to boost participation, as many parents prefer their children to attend tutoring at their schools.

Improving communication with parents: Districts had clearly improved the quality of their communications with parents in 2003-04, with letters home that were much more family-friendly, as well as the quantity and variety of their efforts to communicate with parents. Even so, many parents in focus group interviews had only a vague idea about what might be available to them. Communicating effectively with parents is an art, and districts need to continue to refine their outreach efforts. This is an area where identification and circulation of good models could be beneficial to districts.

Managing administrative costs: Most district administrators continued to express concern about the costs of implementing supplemental services. Significant costs were associated with the mailings to schools and parents, working with the providers, and writing provider contracts.