The American Recovery and Reinvestment Act (ARRA) and Title I Equitable Services to Eligible Private School Children

NASTID January 2010
The American Recovery and Reinvestment Act (ARRA) and Title I Equitable Services to Eligible Private School Children

Virginia Berg
Nola Cromer
This session will provide a discussion of equitable services requirements to eligible private school children with a special emphasis on Title I ARRA funds. The session will present:

- A brief overview of equitable services requirements;
- A conversation about the possible impact on the Title I program being provided for private school children, their teachers and families.
Title I Equitable Services to Eligible Private School Children Under ARRA: Requirements

A Little Background
Under ARRA, LEAs received an additional $10 billion in Title I dollars.
Since ARRA funds are one-time only funds that will no longer be available after September 30, 2011 ...

“LEAs should think how to use their Title I ARRA funds on a short-term basis for activities that will have a long-term impact.”

September 2009 Guidance
The Title I legislation requires participating Local educational agencies (LEAs) to provide eligible private school students, their teachers, and families with Title I services that are equitable to those provided to eligible public school children, their teachers, and their families.
Title I Equitable Services Requirements

Since ARRA dollars are part of each LEA’s Title I allocation, **ALL** applicable requirements in the ESEA, the Title I regulations, other applicable laws and regulations, and OMB Circulars A-87 and A-133 apply to the use of Title I ARRA funds, including those requiring equitable services for eligible private school children, their teachers and families.

**Note:** *ED may not waive the statutory and regulatory requirements relating to equitable services.*
Title I Equitable Services Requirements

What are the Title I equitable services requirements for LEAs?
As is the case for both Title I regular and ARRA funds, in order to meet Equitable Services requirements an LEA must –

1. Provide eligible private school children with an opportunity to participate;
2. Meet the equal expenditure requirements for instruction, professional development, and parental involvement;
3. Assess student needs and the effectiveness of the Title I program; and
4. Begin Title I programs at the same time as the Title I programs for public school children.
Pieces to the Title I Program

- Consultation
- Funds
- Services
- Professional Development
- Family Involvement
- Instruction
What steps must an LEA take to determine the Title I program to be provided to eligible private school children, their teachers and families?
Step 1: Consultation

LEAs are **required** to consult with private school officials.

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

Must an LEA consult with private school officials prior to deciding how to use its Title I, Part A ARRA funds?

Yes. Under section 1120(b) of the ESEA, an LEA must consult with private school officials during the design and development of the LEA’s Title I, Part A programs. That consultation must include meetings of LEA and private school officials and must occur before the LEA makes any decision that affects the opportunities of eligible private school children to participate in Title I, Part A programs.
Consultation

Consultation

- **Must** occur during the design, development, and implementation of the Title I programs.

- Must include *meetings*.

- Must occur prior to the LEA making *any* decisions *including how Title I ARRA funds will be used*. 
Consultation

Topics that must be addressed during consultation can be found in section 200.63 of the Title I regulations.

How LEA will identify needs
  Services
  How, where and by whom
  Evaluation
  Size and scope of services
  Source of low-income data
  Services to teachers and families of participants
  Service delivery mechanism
  Third-party provider
Step 2: Determining the Amount of Funds

The LEA calculates equitable services on Title I ARRA funds in the same way that it calculates equitable services on Title I regular funds.
Determining the Amount of Funds

LEAs must provide equitable participation from funds reserved under section 200.77 of the regulations for the purpose of districtwide instructional activities.

- LEAs must include ARRA funds that have been reserved for districtwide instructional activities.

- This requirement does not apply to reservations for program improvement required under section 1116 of ESEA, homeless, pre-k, or neglected or delinquent programs.
An Example of Calculating Equitable Services

Number of low-income children

In public schools 300
In private schools + 20
320

Title I, Part A and ARRA Allocation funds to be used for Title I summer school

$500,000

x 6.25%

$31,250 proportionate share for eligible private school children
LEA Decisions Can Have a Domino Effect on Title I Equitable Services
Step 3: Considering Existing Services

In consultation with the appropriate private school officials, an LEA should review its existing Title I program to determine how the instructional, professional development, and parental involvement components may be strengthened.
Examples of Additional Services that May Be Provided Because of Title I ARRA Funds

Instruction

• Extending the amount of instructional time, if schedules permit, or providing Saturday classes or summer school;

• Providing Title I services to four-year old children who are enrolled in a preschool program offered by the private school;

• Expanding the Title I reading and mathematics resources;
Examples of Additional Services that May Be Provided Because of Title I ARRA Funds

• Serving more children, particularly if the LEA increases the number of Title I schools being served;
• Providing on-line learning for middle and high school students that is closely monitored by the LEA.
Examples of Additional Activities that May Be Provided Because of Title I ARRA Funds

Professional Development

• Establishing a summer teaching academy for private school teachers of Title I participants to be held at the same time as a Title I summer school so that teachers can observe models of quality instruction for at-risk children.
Examples of Additional Services that May Be Provided Because of Title I ARRA Funds

Combination

• Allowing private school teachers of Title I participants to instruct Title I private school children in a summer school as a demonstration project through which LEA personnel would be able to provide immediate instructional feedback to enable the private school teachers to develop enhanced knowledge and skills on how to instruct Title I children in their own classrooms.
Examples of Additional Activities that May Be Provided Because of Title I ARRA Funds

Family Involvement

• Establishing a Title I parent center or resource library in the Title I classroom or another appropriate space with computers, DVDs, and other resource materials that parents of Title I participants may use after school or in the evenings, which would be staffed by the LEA;

• Providing additional resources for parents of Title I participants to use at home with their children.
“In a global economy where the most valuable skill you can sell is your knowledge, a good education is no longer just a pathway to opportunity – it is a prerequisite. The countries that out-teach us today will out compete us tomorrow.”

- President Barack Obama, 2/24/09
Additional Questions?
Title I Statute, Regulations, and Guidance


- Title I Program Office
  - [Virginia.Berg@ed.gov](mailto:Virginia.Berg@ed.gov)
    202-260-0926
  - [Nola.Cromer@ed.gov](mailto:Nola.Cromer@ed.gov)
    202-205-4158