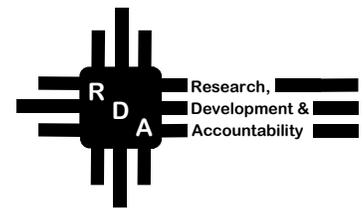


ALBUQUERQUE PUBLIC SCHOOLS

Title I Private School Program
Evaluation Report
2003-2004

March 2005
Debra Heath



ALBUQUERQUE PUBLIC SCHOOLS

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Title I Private School Program Evaluation 2003-2004 Albuquerque Public Schools

Executive Summary

Under Title I - Part A of the federal Elementary and Secondary Education Act, the Albuquerque Public School (APS) district is required to provide educational services for private school students who have academic need and reside in Title I public school attendance areas. In 2003-04, APS' Title I private school program staff focused on reestablishing positive relationships with private school officials and on clarifying and meeting new federal NCLB requirements. Research, Development and Accountability (RDA) conducted an evaluation of the 2003-04 Title I private school program to determine the degree to which these process goals were achieved.

This evaluation found that APS met many but not all of its Title I private school program goals. Among its achievements, APS' Title I office:

- reestablished positive relations with private schools,
- met most consultation requirements, and
- improved private school officials' awareness of APS professional development opportunities.

RDA also identified a number of apparent deviations from federal Title I statutes. Increasing compliance with federal legislation would require:

- an increase in extended-day services, replacing the current focus on pull-out services,
- more consultation with private school officials regarding how funding allocations are determined, and
- a shift in APS' role from *paying* for Title I programs to *planning, designing and implementing* Title I programs.

The greatest impediments to providing Title I services were APS budget and procurement delays. Funding delays contributed to the following reductions in service:

- Three of the 9 schools that had hosted Title I programs in past years declined to offer direct Title I instructional services in 2003-04.
- Only 139 private school students received Title I instructional services in 2003-04, about half the number of students served in previous years.

In its 2004-05 application for Title I funds, APS proposed serving about 340 students in 13 private school schools. These figures suggest a return to historical levels of activity.

In order to reinforce and maintain this apparent recovery, APS must resolve its financial delays. APS' financial departments must make Title I funds available for programming at the start of the school year if APS is to adequately serve low-income children, help them achieve high academic standards, and fully meet the terms of federal law.

Title I Private School Program Evaluation 2003-2004

Background and Purpose

Since it was first authorized in 1965, The Elementary and Secondary Education Act (ESEA) has required that local education agencies (LEA) provide educational services to private school students who (1) are most at risk of failing to meet high academic standards and (2) live in areas of high poverty. The 1985 *Aguilar v. Fenton* ruling forbade LEAs from providing services on the premises of religious schools. Like many districts, Albuquerque Public Schools (APS) complied with this ruling by providing computer-assisted instructional services in portable units and vans.

The 2001 reauthorization of the ESEA ended funding for nonpublic capital expenses, starting in the 2002-03 school year. This forced APS to terminate its computer-assisted instructional program for private school students. APS' Categorical Programs Office allocated 2002-03 and 2003-04 private school funds on a per-pupil basis and asked each private school to develop its own proposal for using those funds.

During the 2002-03 school year, APS' Title I staffing dwindled from 40 to 2 full-time positions. Staff members were forced to spend most of their time remediating serious accounting problems. No staff had time for refocusing, planning and coordinating private school programs. As a result, APS did not channel funds to private schools in an efficient manner nor did it provide adequate administrative and technical support to private schools. Some private schools were unable to provide Title I services. Others had to scale back their planned Title I services. A number of private school officials considered withdrawing their school from participation in the Title I program.

APS began the 2003-04 school year with a new Title I Instructional Manager and a new NCLB Private Schools Coordinator. With these new staff members, APS administrators hoped to rebuild the district's Title I private school program and reestablish positive and productive working relationships with private school officials.

APS' NCLB/Title I office set the following goals for the 2003-04 private schools program:

1. Establish rapport and positive relationships with private schools.
2. Conduct a meaningful and timely consultation process as mandated by federal law.
3. Understand and document private schools' Title I funded activities.
4. Ensure that private school programs receive all Title I funding to which they are entitled.
5. Plan the development of a comprehensive LEA program for Title I private school students, as deemed appropriate after consultation with private schools.
6. Create channels for private school staff to participate in APS professional development activities.

The Research, Development and Accountability (RDA) department of APS agreed to evaluate APS' 2003-04 Title I private school program against the above goals. This report summarizes findings related to each goal. The final sections provide overarching conclusions as well as recommendations.

Methods

RDA used a combination of evaluation methods, including surveys, service reports, observations and meetings. These are described below.

Private School Survey (Appendix A)

Private school officials completed pre- and post-test surveys designed to evaluate changes in their satisfaction with APS' NCLB operations and in their knowledge of NCLB requirements. RDA administered the "pretest" survey in September of 2003, asking respondents to rate their satisfaction with APS services during the previous school year (2002-03). Officials rated their satisfaction with the 2003-04 year on the "posttest" survey administered in April 2004.

Consultation Letter (Appendix B)

RDA asked private school officials to complete a form letter and provide written comments about the consultation process in April 2004.

Professional Development Participation Survey (Appendix C)

The professional development participation report form asked private school officials to list all APS professional development events attended by private school representatives during 2003-04. The survey also asked them to cite reasons for not attending more APS events.

Service Reports (Appendix D)

At the end of 2003-04, RDA requested service reports from all private schools with Title I programs. Reports requested information on students served; their grade levels; and the number of hours and types of services they received. Officials from 5 of the 8 participating schools submitted reports. RDA gathered information from the other 3 schools by phone and email.

Observations and Meetings

RDA collected information about APS' Title I program goals, activities, and system facilitators and barriers through meetings with program staff as well as observations of consultation meetings with private school officials.

Table 1. Data Collection Methods, Target Indicators and Sources.

Data Collection Methods	Target Indicators	Sources
Private School Survey	Satisfaction, attitudes & knowledge	Private school officials
Consultation Letter	Satisfaction with consultation process	Private school officials
Professional Development Participation Survey	Participation in APS professional development, & barriers to participation	Private school officials
Observations – Consultation Meetings	APS processes, communications and systems	Title I program staff & private school officials
Title I Service Reports	Number of hours and types of services provided; Number and grade levels of students.	Title I teachers/staff
Meetings	Facilitators and barriers to program effectiveness.	Title I program staff

Results

This section summarizes evaluation findings related to each of APS' 6 goals for the Title I private school program in 2003-04.

Goal 1: Establish rapport and positive relationships with private schools.

Survey results indicate that private school officials' satisfaction with APS-private school relations increased significantly in 2003-04 compared to 2002-03. In written comments, private school staff attributed their increased satisfaction to APS' NCLB Private School Coordinator.

Private school staff indicated that they were more satisfied with:

- the timeliness, accuracy, completeness and clarity of information and the frequency of communication provided by APS (Figure 1);
- the availability and quality of APS administrative and technical support (Figure 2); and
- APS' responsiveness to private school needs (Figure 2).

At the same time, survey results suggest that many private school officials continued to lack confidence in their understanding of NCLB requirements.

- There was no change in the proportion of officials expressing an understanding of NCLB requirements for private schools (60%).
- There was a slight *decrease* in the proportion of private school officials' who felt capable of ensuring compliance with NCLB (from 59% to 50%).

Figure 1. Percent Private School Officials Expressing Satisfaction with APS Communications: 2002-03 Compared to 2003-04.

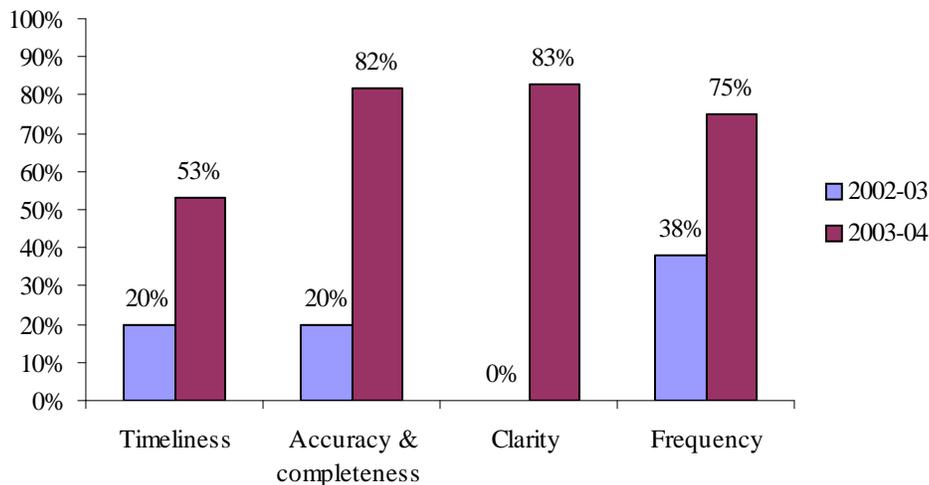
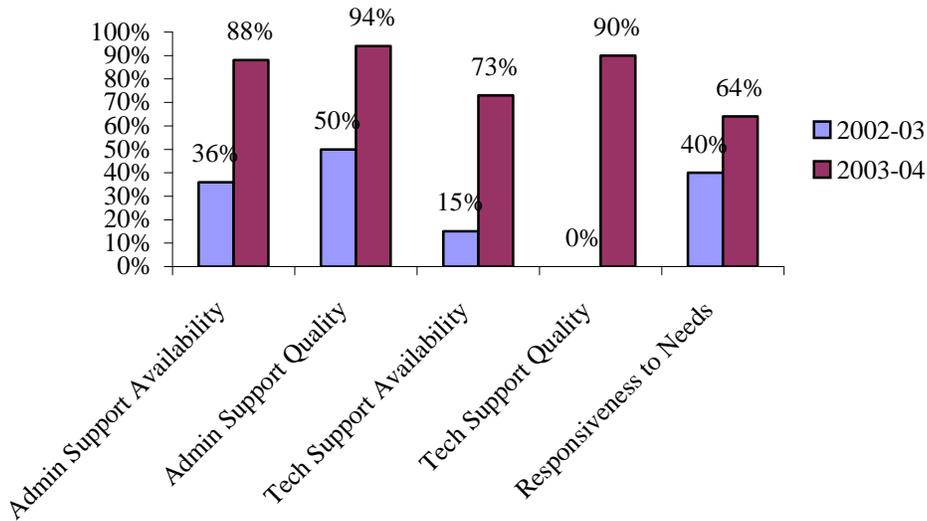


Figure 2. Percent Private School Officials Expressing Satisfaction with Administrative and Technical Support: 2002-03 Compared to 2003-04.



Goal 2: Conduct a meaningful and timely consultation process as mandated by federal law.

Federal law requires APS to provide private schools with timely and meaningful opportunities for consultation related to funds allocation, student needs identification, and the determination and evaluation of services. Consultation is considered adequate when the LEA makes final decisions only after giving private school officials a “genuine opportunity...to express their views and to have those views considered.”¹

APS held four consultation meetings between September 2003 and April 2004. Survey results indicate that the vast majority of private school officials (94%) believed these meetings were productive or informative. The meetings may have helped cultivate a greater sense of participation in APS decisions by private school officials. More than three-quarters (77%) of those surveyed in the spring of 2004 agreed that APS takes private school views and interests into account when making programmatic and budgetary decisions, compared to 31% at the beginning of the 2003-04 school year.

Representatives of 12 out of the 17 schools that completed consultation letters affirmed that APS had offered timely and meaningful consultation opportunities. Five school representatives disagreed. One wrote that she didn’t feel consulted in a meaningful way. Others said APS did not provide timely or full access to information and funding.

¹ Title I Services to Eligible Private School Children: Non-Regulatory Guidance, October 17, 2003, page 6.

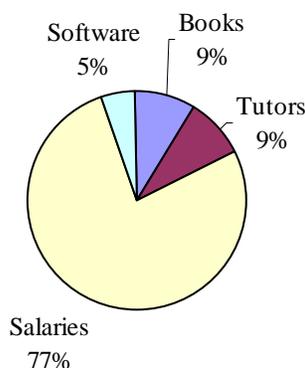
Goal 3: Understand and document private schools' Title I funded activities.

Eight private schools submitted proposals to APS for 2003-04 Title I programs. Six of these schools delivered direct instructional services to Title I students. Two schools used Title I funds exclusively to purchase books and software. Five of the 6 schools that delivered direct instructional services submitted written end-of-the-year service reports and one provided a verbal report.

Title I Allocations and Services

APS allocated a total of \$145,264 for 9 private school Title I programs in 2003-04. APS' Categorical Office could not provide actual expenditures by school. According to Title I office records, actual private school program expenditures totaled \$130,314 to 8 schools (90% of total allocations). Individual school expenditures ranged from a low of \$74 (2% of its allocation) to a high of \$42,965 (100% of its allocation). APS teacher salaries accounted for over three-quarters of Title I private school program expenditures in 2003-04. Non-APS tutors, books and software were the other main expense categories.

Figure 3. Title I Private School Program Expenditures 2003-2004, by Category



Private school reports show that a total of 139 children at 6 schools received Title I-funded direct instructional services during the 2003-04 school year. At 4 schools the children received instruction from APS teachers, and at 2 schools they received tutoring from non-APS instructors. Students were in grades K-8, but the majority (75%) was in grades 1 – 3. Five schools purchased books and/or software with Title I funds.

The number of students served in 2003-04 (139) was far fewer than the numbers of students served in years prior to 2002-03 (Table 2). Private school programs delivered Title I services to 237 students in 2001-02, and 310 students in 2000-01. During those years, Title I funds were used to provide computer-assisted instructional services and APS had staff responsible for program coordination. During 2002-03 and 2003-04, by contrast, APS asked private schools to organize services, had less Title I staff support, and experienced many funding delays. As highlighted in Table 2, at least 3 schools that had hosted Title I programs in past years declined to offer Title I instructional services in 2003-04. Officials blamed APS funding problems for the lack of Title I services in their schools.

Table 2. Private Schools Delivering Direct Title I Instructional Services: 2003-04 Compared to Previous Years.

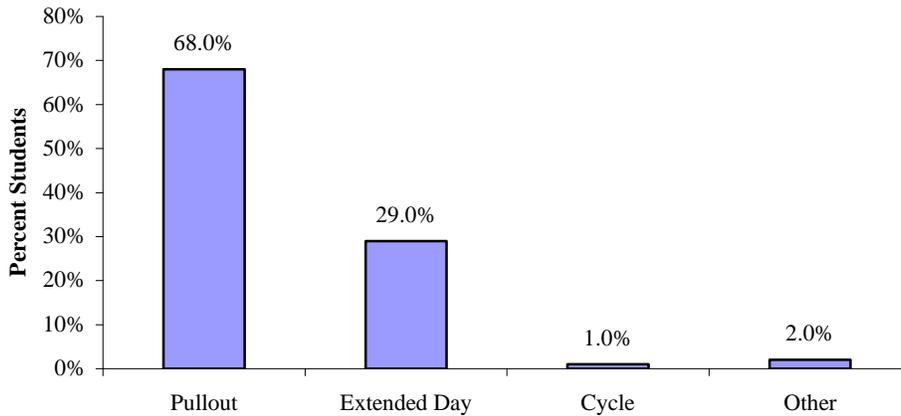
School	Total Served 2000-01	Total Served 2001-02	Total Served 2003-04
Holy Ghost	25	44	34
Immanuel Lutheran	29	34	7
Queen of Heaven	NA	25	24
St. Charles	31	26	18
St. Mary's	58	24	35
San Felipe de Neri	57	52	21
St. Therese ²	36	NA	0
Our Lady of Fatima	26	16	0
Our Lady's Assumption ²	48	40	0
TOTALS	310	237	139

NA = Not available.

Contexts of Instructional Service

The most common approach to providing Title I instructional services in private schools involved pulling students out of their regular classes. Two-thirds (68%) of the Title I students in private schools received pull-out services, or a combination of pull-out and in-class instruction. Almost one-third (29%) received after-school tutoring. The remaining 4 students received intensive short-term instruction (“cycle”) or other approaches.

Figure 4. Percentages of Private School Students by Title I Instructional Context, 2003-04.



The overwhelming reliance on pull-out services as an approach to delivering Title I instruction to private school students may contradict NCLB regulations. Title I statutes require the LEA to “give primary consideration to providing extended learning time.” Recommended services include, but are not limited to: instructional services provided by public school employees or third-party contractors, extended-day services, family literacy services, counseling programs, computer-assisted instruction, home tutoring, and instruction using take-home computers.³

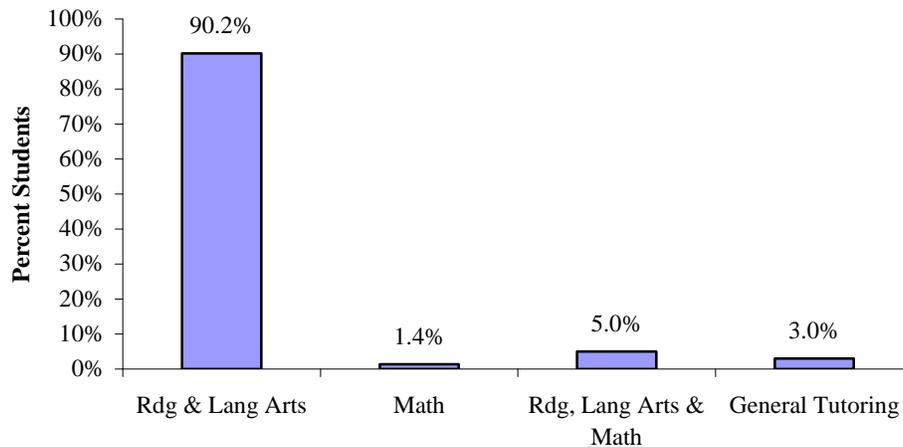
² Purchased books and software with Title I funds. Did not provide direct Title I instructional services.

³ Title I Services to Eligible Private School Children: Non-Regulatory Guidance, October 17, 2003, page 21.

Curricular Focus

Reading/language arts was the most popular focus of private school Title I services. Ninety percent of students received instruction in reading and language arts, and another 5% received instruction in reading, language arts and math. The remaining 4% received “general tutoring” or math assistance.

Figure 5. Percentages of Private School Students by Title I Curricular Focus, 2003-04.



Frequency and Duration of Service

Most participating private school students received 30 minutes or fewer of Title I instruction 2 or 3 times per week. Just over one-third received sessions lasting longer than 30 minutes.

Figure 6. Percent Students by Days per Week of Title I Instructional Service, 2003-04.

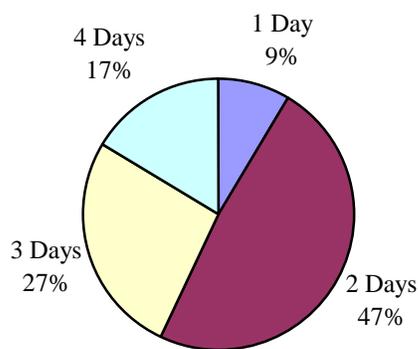
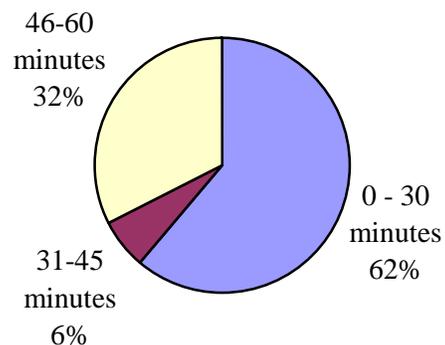


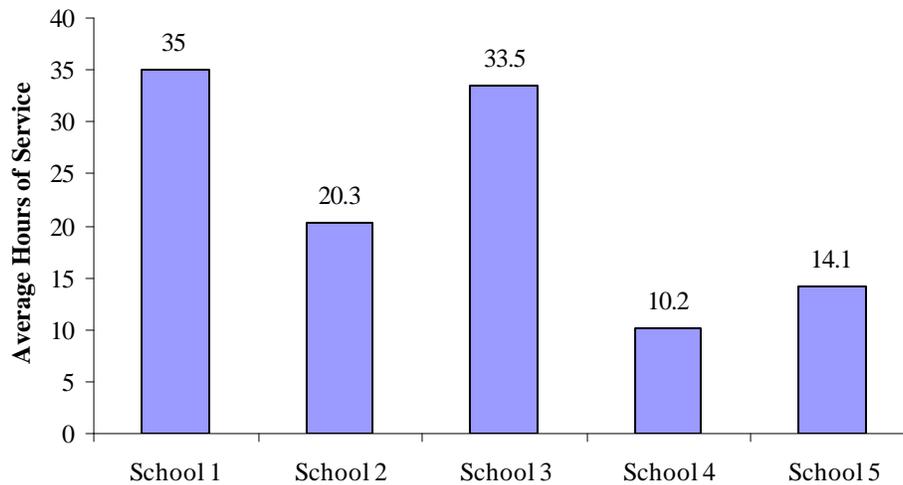
Figure 7. Percent Students by Length of Title I Instructional Sessions, 2003-04.



Hours of Instructional Service

The total hours of Title I instructional services delivered by each school ranged from an average of 10 hours per student to 35 hours per student. Students at the school with the fewest service hours did not receive services until 5 months into the school year (January 2004).⁴ Reports from school officials, Title I teachers and Title I staff suggest that more hours of services could have been delivered if APS had provided funding in a timely manner.

Figure 8. Total Hours of Instructional Service Received on Average Per Student, by School, 2003-04.⁵



Goal 4: Ensure that private school programs receive all Title I funding to which they are entitled.

Evaluation findings suggest that APS improved but did not solve severe problems in its handling of Title I funding for private school students. Furthermore, research regarding NCLB legislation revealed that APS may need to do more to meet the requirement for consulting with private school officials regarding the allocation of Title I funds.

Funds Management

Private school officials and Title I staff expressed frustration with APS' management of federal program funds. One official reported that 8 months into a 9-month school year her school still had not received authorization for Title I teachers to get paid. Title I staff explained that many private school officials did not trust APS enough to begin offering services when APS authorized expenditures to start in January 2004. School officials also said it was hard to get information on the status of purchase orders and that there were long response times to their inquiries.

The NCLB private schools coordinator reported extensive and repeated contacts with the APS Budget Office and Categorical Office to facilitate the flow of funds to private schools. However, toward the end of the school year (April 2004), private school account numbers still had not been

⁴ Phone communication with Title I teacher, January 10, 2005.

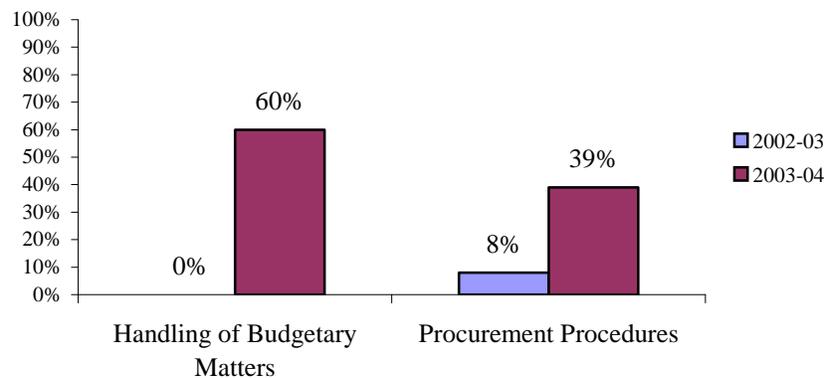
⁵ One school did not provide documentation with actual hours of instructional service.

assigned correctly and budgets still had not been loaded completely, making it impossible to transfer program funds.

The inaccessibility of private school funds caused at least one school to refrain from offering services and reduced the total number of students who received services. Funding delays also continued to undermine APS' credibility among private school officials.

Survey results indicate that the satisfaction of private school officials with budgetary and procurement matters improved compared to the previous year, yet remained low (Figure 8). Fewer than half of all private school survey participants were satisfied with APS' handling of procurements and payments.

Figure 9. Percent Private School Officials Expressing Satisfaction with APS' Handling of Budgetary and Procurement Matters: 2002-03 Compared to 2003-04.



Determination of Funding Allocations

Federal law requires APS to consult with private school officials regarding the process for determining Title I funding allocations. Historically, APS has allocated funds based on yearly counts of private school students who meet low-income guidelines. RDA's analysis is that free and reduced price meal counts continue to offer the most accurate way of allocating Title I funds. However, federal law provides alternative methods, and APS is required to discuss these alternatives with private school officials before making a final decision each year.

Goal 5: Plan the development of a comprehensive LEA program for Title I private school students, as deemed appropriate after consultation with private schools.

According to NCLB legislation, “the Local Educational Agency [APS] is responsible for planning, designing and implementing the Title I program and may not delegate that responsibility to the private schools or their officials.”⁶ Prior to 2002-03, APS provided computer-assisted instruction through a staff of 8 full-time APS instructors. In 2002-03 and 2003-04, by contrast, APS asked private schools to develop and administer their own Title I programs. This resulted in as many different Title I programs as there were private schools. It also created an apparent deviation from Title I statutes.

The NCLB private schools coordinator saw 2003-04 as a year for considering if and how to reestablish a cohesive Title I private school program designed and operated by APS. Doing so would better meet the spirit of NCLB legislation and also facilitate adequate evaluation of Title I activities and outcomes.

APS Title I staff introduced the possibility of developing a comprehensive Title I private school program at consultation meetings. One proposed option was to pool funds, so that a number of schools would share one program of services. Private school officials voiced disapproval.

Also during 2003-04, RDA and TLS staff secured information from federal officials suggesting that APS could continue to fund and evaluate individual private school programs. By the end of 2003-04, Title I staff voiced an inclination to continue funding individual private school programs.

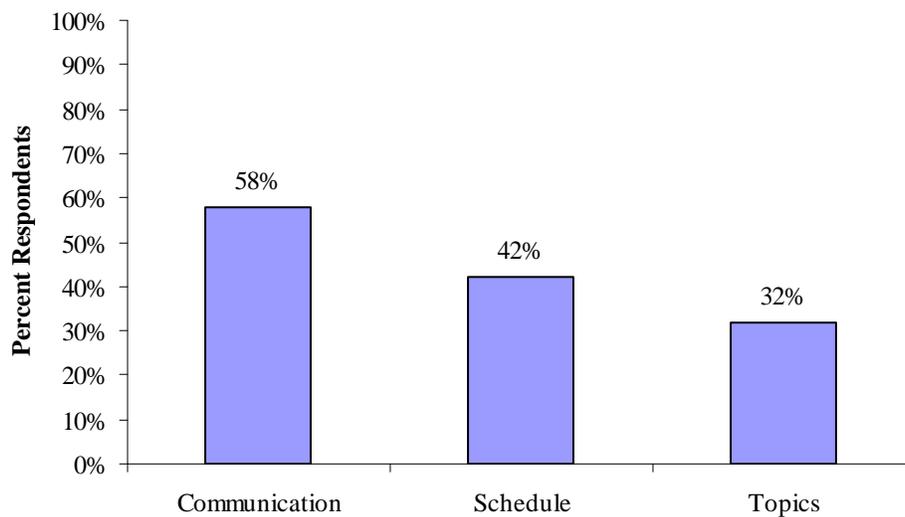
⁶ Title I Services to Eligible Private School Children: Non-Regulatory Guidance, October 17, 2003, page 21.

Goal 6: Create channels for private school staff to participate in APS professional development opportunities.

The private school coordinator distributed the 2003-04 TLS Staff Development Guide and used meetings and email to encourage private school staff to take advantage of APS professional development opportunities.

Results from the Professional Development Participation Survey show that staff from three private schools attended one APS professional development event. Over half the school representatives blamed internal communication difficulties for their lack of attendance. Most acknowledged that the APS private schools coordinator had provided ample and timely information. Schedule incompatibility was the second most cited barrier to attending APS events. Finally, about one-third of school representatives said the topics of APS sessions did not meet their schools' needs.

Figure 10. Percent Private School Representatives Citing Communication, Scheduling and Topics as Barriers to Attending APS Professional Development Events.



Conclusions

This evaluation found that APS met many but not all of the 2003-04 private school goals set by APS' Title I office. Among its accomplishments, APS' Title I private school program:

- improved APS' relations with private schools,
- met most private school consultation requirements, and
- increased private school officials' awareness of APS professional development opportunities.

Improvements were due largely to the dedicated attention of APS' NCLB private schools coordinator. She amplified APS' understanding of NCLB legislation related to private schools, facilitated budgetary and procurement matters, and provided consistent and clear communications.

Improved communications and trust catalyzed increases in private school Title I participation. For the 2004-05 school year, 13 private schools offered to provide Title I services to about 340 students -- more schools and more students than in any of the previous three years. This suggests that APS' private school Title I program was returning to and surpassing historical levels of activity, after two "transition" years.

RDA also identified a number of apparent departures from Title I statutes, including:

- an emphasis on pull-out services,
- inadequate consultation regarding the determination of funding allocations, and
- a program structure that delegated responsibility to private school officials for designing and implementing Title I programs instead of centralizing these functions within APS.

Finally, APS severely delayed the availability of funds for instructional programming. Financial delays contributed to reductions in service, including:

- a decline in the number of private schools that delivered direct Title I instructional services, from 9 in 2001-02 to 6 in 2003-04; and
- a decrease in the number of children who benefited from Title I services (139 in 2003-04, compared to 237 in 2001-02 and 310 students in 2000-01).

APS must find a way to make funds available for programming at the start of the school year if it is to adequately serve low-income children, help them achieve high academic standards, and fully meet the terms of federal law.

Recommendations

RDA recommends the following actions to strengthen APS' private school programs, increase their impact on students and meet federal requirements:

1. Make funds available for programming before the start of every school year, so teachers may be hired to start on the first day of school.
2. Discuss funding allocation approaches in consultation meetings with private school officials in order to meet federal requirements.
3. Work with private school officials to increase extended-day services for Title I students, as required by Title I statutes, replacing the current emphasis on pull-out services.
4. Consider how APS will meet federal expectations for APS to play the role of *planning, designing* and *implementing* Title I programs for private school students.
5. Refine and develop evaluation tools to collect more comprehensive information about financial expenditures and the impact of Title I services on student achievement.

Appendix A

Private Schools Survey September 2003

How much do you agree or disagree with the following statements?

	<i>Strongly Disagree</i>	<i>Disagree</i>	<i>Agree</i>	<i>Strongly Agree</i>	Comments & Recommendations
1. I know what the NCLB requirements are for private schools.					
2. I understand the NCLB requirements for private schools.					
3. I know NCLB requirements for private schools well enough to help make sure my school's programs are in compliance with the law.					
4. APS goals for private school programs and services are clear.					
6. APS takes private school views and interests into account when making decisions about programmatic and budgetary issues related to private schools.					
7. APS meetings for private schools are productive					

Appendix A

Think back about your relationship with APS during the 2002-2003 school year. Please indicate your level of satisfaction and provide suggestions for improvement.

	Very Dissatisfied	Dissatisfied	Satisfied	Very Satisfied	Suggestions for Improvement
Timeliness of information provided by APS.					
Accuracy & completeness of information provided by APS.					
Clarity of information provided by APS.					
Availability of APS administrative support (such as)					
Quality of APS administrative support.					
Availability of APS technical support (such as)					
Quality of APS technical support.					
Frequency of communication by (or contact with) APS.					
APS responsiveness to your school's needs.					
APS handling of budgetary matters.					
Procurement procedures					

Appendix A

Private Schools Survey

April 2004

How much do you agree or disagree with the following statements?

	<i>Strongly Disagree</i>	<i>Disagree</i>	<i>Agree</i>	<i>Strongly Agree</i>	Comments & Recommendations
1. I know what the NCLB requirements are for private schools.					
2. I understand the NCLB requirements for private schools.					
3. I know NCLB requirements for private schools well enough to help make sure my school's programs are in compliance with the law.					
4. APS goals for private school programs and services are clear.					
5. APS takes private school views and interests into account when making decisions about programmatic and budgetary issues related to private schools.					
6. APS meetings for private schools are productive					

Appendix A

Think back about your relationship with APS during the 2003-2004 school year. Please indicate your level of satisfaction and provide suggestions for improvement.

	Very Dissatisfied	Dissatisfied	Satisfied	Very Satisfied	Suggestions for Improvement
Timeliness of information provided by APS.					
Accuracy & completeness of information provided by APS.					
Clarity of information provided by APS.					
Availability of APS administrative support (such as)					
Quality of APS administrative support.					
Availability of APS technical support (such as)					
Quality of APS technical support.					
Frequency of communication by (or contact with) APS.					
APS responsiveness to your school's needs.					
APS handling of budgetary matters.					
Procurement procedures					

Appendix B

2003-2004 Non-Public Schools Consultation Letter

I agree that Albuquerque Public Schools offered timely and meaningful opportunities for consultation with appropriate officials from my school during the 2003-2004 school year.

Our school had meaningful input into the following:

- how funds were allocated,
- how children's needs were identified,
- what services were offered, and
- how services were assessed.

Further, we were consulted before final decisions were made on issues affecting the opportunities of eligible private school children to participate in Title I programs.

Comments:

Sincerely,

Signature: _____

Official's Printed Name: _____

Official's Title: _____

School Name: _____

Today's Date: _____

Appendix C

NCLB Title II Professional Development Participation Report 2003-2004

School Name: _____

Please list the APS professional development events attended by representatives of your school during the 2003 – 2004 school year.

Event Name or Topic	Month	Number of Staff Who Attended

Staff from my school did not attend any APS professional development event.

We did not attend any APS professional development event this year because:

- Topics did not meet our needs.
- Schedule did not match our availability or needs.
- Staff didn't get information about APS events.
- Other. Please explain:

Comments:

