



**ALBUQUERQUE
PUBLIC SCHOOLS**

Title I Private School Program Evaluation

2006-2007

District Goal: Academic Excellence

May 2008
Debra Heath



ALBUQUERQUE PUBLIC SCHOOLS

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APS Title I Private School Program Evaluation 2006-2007 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 2006-07, APS sponsored 11 individual private school Title I programs. The goal of these programs was to improve the reading comprehension and/or basic math skills of at least 80 percent of Title I students by a minimum of 0.5 grade-level equivalents. Research, Development and Accountability conducted an evaluation to satisfy federal and state requirements and to provide information for program improvement. Highlights are below.

Student Achievement Outcomes - Annual Progress

- ◆ In reading and language arts, 80.5% of private school students who received Title I instruction improved skills by 0.5 grade level equivalents or more.
- ◆ In math, 81.8% of private students who received Title I instruction improved skills by 0.5 grade level equivalents or more.
- ◆ Four out of eight private school programs met the annual progress goal in reading.
- ◆ Four of five private school programs met the annual progress goal in math.

Title I Services

- ◆ Nine private school programs provided Title I supplementary instructional services, mostly in reading and language arts, to 176 students. Of those students:
 - Almost two-thirds received only one or two days per week of Title I instruction. The remainder received instruction 3 days per week.
 - Almost half (45%) received 30 minutes of instruction or less per session. One-third received between 31 and 45 minutes per session.
 - In total over the year, students received an average of 27 hours of Title I instruction.
- ◆ One school used Title I funds to provide counseling services to 29 students.
- ◆ One school used Title I funds to assess 111 students for reading intervention placements.
- ◆ Title I services at 7 schools started in August or September, 1 started in November and 3 had unknown start dates.
- ◆ Almost half of students originally identified as Title I-eligible (47%) received educational or counseling services.
- ◆ Private school officials reported satisfaction with the way APS handled most Title I program affairs. Satisfaction with budget loading and procurement increased markedly compared to previous years.

Evaluation results suggest that the following issues may require attention:

- ◆ Starting services at the beginning of the school year;
- ◆ Establishing adequate scope, intensity and duration of services;
- ◆ Defining and measuring Annual Progress;
- ◆ Ensuring that service reports are provided by all participating private schools;
- ◆ Clarifying eligibility and funding allocation processes; and
- ◆ Establishing clear expectations for consultation.

Background and Purpose

Since it was first authorized in 1965, The Elementary and Secondary Education Act (ESEA) has required local education agencies (LEAs) to use federal Title I funds to provide supplemental educational services to private school students. Eligible private school students meet two criteria: (1) they live in Title I designated public school attendance areas, and (2) they are at risk of failing to meet high academic standards.

For many years, Albuquerque Public Schools (APS) provided a computer-assisted instructional (CAI) program for Title I-eligible private school students. APS teachers or educational assistants staffed the program, which was held in APS portables on private school grounds.

APS' Title I program for private school students shifted dramatically in 2002-03. The ESEA's 2001 reauthorization, called No Child Left Behind (NCLB), ended funding for non-public capital expenses. This forced APS to terminate the CAI program. Starting in 2002-03, APS' Grants Management and Title I offices asked each private school to develop its own proposal for using Title I funds. This practice paralleled the public school Title I grant allocation process.

Federal expectations for evaluating Title I programs for private school children also changed. Starting in 2002-03, APS' department of Research, Development and Accountability shifted its evaluation efforts to meet the following state and federal expectations:

1. Consult annually with private school officials about evaluation methods, measures and the use of evaluation results.
2. Define academic "annual progress" goals against which to evaluate the effectiveness of Title I programs for private school students (similar to Adequate Yearly Progress for public schools).
3. Evaluate services and "annual progress" outcomes on an annual basis.
4. If students fail to meet annual progress goals, recommend how Title I services will be improved.

RDA used the following data collection tools for the 2006-07 evaluation:

Table 1. 2006-07 Evaluation Data Collection Tools and Sources

Data Collection Tool	Data Source
1. 'Masterlist' service delivery spreadsheet	Title I teachers and/or private school officials
2. Questionnaire	Private school officials and/or Title I teachers
3. Allocation and expenditure records	Title I Grants Management Coordinator

Annual Progress

Federal law states that private school students who participate in Title I programs must be held to the same challenging standards that the state expects all public school students to meet. The law further states that the “LEA must annually assess the progress of the Title I program toward enabling private school Title I participants to meet the agreed-upon standards.” To do this, “every year the LEA and private school officials must consult on what constitutes ‘annual progress’ for the Title I program.”¹

Guidelines related to defining and evaluating “annual progress” are fairly general. The October 2003 Non-Regulatory Guidance for Title I Services to Private School Children provides the following parameters:

- Annual progress goals should align with state content and student achievement standards or with private school standards that are just as challenging as state standards.
- The LEA only needs to assess private school students in the subjects in which the LEA provides Title I services.
- Private school officials may provide the LEA with assessment data it has collected as part of its testing program. Alternatively, Title I funds may be used to assess private school children if the assessment is used only for Title I purposes.

¹ U.S. Department of Education. (2003, October 17). *Title I Services to Eligible Private School Children: Non-Regulatory Guidance*, page 31. Retrieved on August 4, 2004 and March 7, 2008 from <http://www.ed.gov/programs/titleiparta/psguidance.doc>

- The LEA has flexibility to group student data in ways that will produce the most accurate information about student progress.
- The LEA must evaluate the effect of all Title I services, including professional development and counseling services, on academic achievement.

The 2006-07 definition of Annual Progress carried over unchanged from 2005-06 after calculations showed that a higher level of growth (0.75 grade-level equivalent) was not achieved by a majority of students in 2005-06. Private school and APS representatives agreed to maintain the following annual progress goals:

- 80% of Title I students will improve their *reading comprehension* skills by 0.5 grade-level equivalents, and
- 80% of Title I students will improve their *basic math* skills by 0.5 grade-level equivalents.

Results

Description of Services

Title I Allocations and Expenditures

APS allocated a total of \$136,340 for eleven private school Title I programs in 2006-07, 100% of which was expended. A total of \$10,500 was allocated for parent involvement activities and \$12,387 for professional development. Individual school expenditures ranged from a low of \$1,780 to a high of \$35,355. Nine private school programs used Title I funds to pay for teacher or tutor salaries. One private school used its \$3,840 allocation for a computer-based reading assessment program. Another used its \$3,900 allocation to purchase counseling services, as allowed by Title I statute when allocated funds are not sufficient to provide instructional services.²

Students Served

Private school Title I instructional services reached 176 students in 2006-07, a decrease of 56 students compared to 2005-06 and equivalent to 2004-05 (See Table 2). Ninety-three percent of students served were in kindergarten through fifth grade. The remaining seven percent were in grades six through eight. All schools but two decreased the number of students they served compared to the previous year.

Instead of direct instructional services, one school used its Title I allocation for a part-time counselor who served a total of 29 Title I students. The intent was to provide students with support related to self-esteem, bullying, and relationships with family, peers and teachers. Students and staff provided feedback that the counseling services fostered student success in school. A private high school used its small allocation to assess students' reading fluency and comprehension to ensure proper placement in reading intervention programs.

Out of the total number of students originally identified as eligible for Title I services (440) at the elementary or middle school levels, 47% actually received them.³ A total of 166 students

² U.S. Department of Education. (2003, October 17). *Title I Services to Eligible Private School Children Non-Regulatory Guidance*. B-34, pp 20-21.

³ Private school teachers rated students' academic need in the spring of 2006. Not all these students reenrolled for the 2006-07 school year. New students assessed to have academic need were added in the fall of 2006.

received instructional services for the entire school year. Ten received instructional services for part of the year. Twenty-nine students received Title I funded counseling services. RDA's spring 2007 questionnaire asked private school representatives to indicate why schools served fewer students than were eligible. Out of seven respondents, five cited small Title I allocations and one also cited parent refusal of services. Respondents from two schools indicated that their schools served ALL eligible Title I students. This indicates a potential misunderstanding about Title I eligibility and services.

Table 2. Number of Students That Received Direct Title I Instructional Services by Private School: 2006-07 Compared to Previous Years.

School	Number of Students Served					
	2000-01	2001-02	2003-04	2004-05	2005-06	2006-07
Holy Ghost	25	44	34	21	27	21
Immanuel Lutheran	29	34	7	6	6	6
Queen of Heaven	NA	25	24	17	30	22
St. Charles	31	26	18	44	47	41
St. Mary's	58	24	35	41	48	40
Salam Academy	NA	NA	NA	NA	3	6
San Felipe de Neri	57	52	21	25	33	31
Our Lady of Fatima	26	16	0	10	2	NA
St. Therese	36	NA	0	10	23	6
Our Lady's Assumption	48	40	0	0	13	0*
St. Pius X	NA	NA	NA	NA	NA	0**
TOTALS	310	237	139	174	232	176

NA = Not available or no Title I activity.

* Provided counseling services to 29 students.

** Conducted computer-based reading assessments for 111 10th – 12th grade students.

Start Times

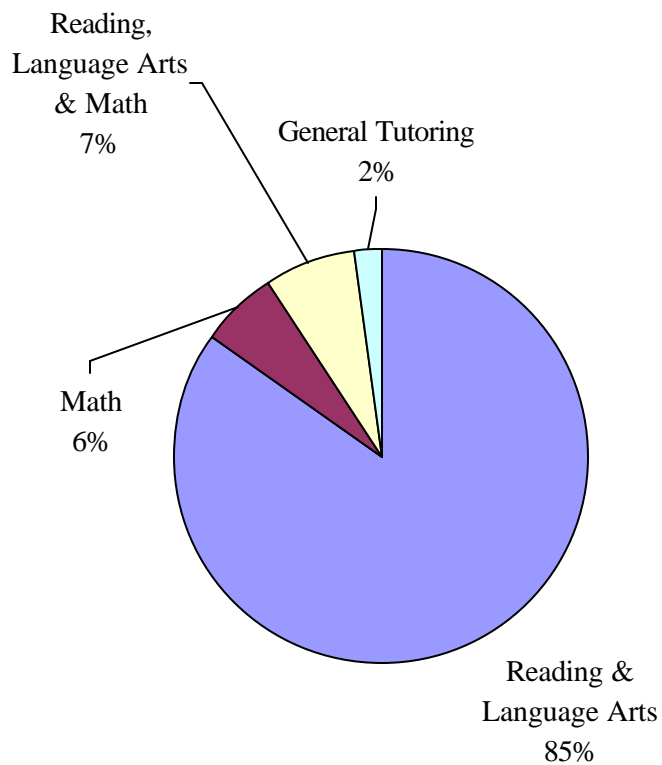
Under the equitable service provision of the Title I statute, the Title I program for private school students must begin at the same time as the Title I program for public school participants.⁴ Of eight schools responding to RDA's spring questionnaire, three reported starting Title I services in August, four in September and one in November. The school that started in November cited administrative problems as the cause of the delay. Three schools did not provide information on start times.

⁴ U.S. Department of Education. (2003, October 17). *Title I Services to Eligible Private School Children Non-Regulatory Guidance*. Page 22.

Curricular Focus

Reading/language arts was the most popular curricular focus of private school Title I services. As shown in Figure 1, of students who received direct instructional services, 85% (149) received instruction in reading and language arts and another seven percent (12) received instruction in a combination of reading, language arts and math. Six percent of students (11) received math assistance alone. Two percent of students (4) received general tutoring.

Figure 1. Percentages of Private School Students by Title I Curricular Focus, 2006-07 (K-8th graders only).



Approaches to Scheduling Title I Services

The Title I statute requires APS, as the LEA, to design a private school program for private school students that (1) “give[s] primary consideration to providing extended learning time” and (2) employs research-based strategies for improving academic achievement.⁵ Research shows that successful interventions provide struggling students with extra time in reading and writing compared to low-risk students.⁶

Within the APS program however, the most common approach to scheduling Title I services for private school students involves pulling students out of their regular classes. In fact, as illustrated in Figure 2, the pullout approach was more common in 2006-07 than in any year on record. Eighty-four percent of Title I participants receiving direct instructional services were served in a pullout format in 2006-07. A small minority (6%) received Title I instruction as an extension to their regular school day. Information on whether students were pulled from core academic content or from other activities was not collected; APS may wish to collect this data in the future.

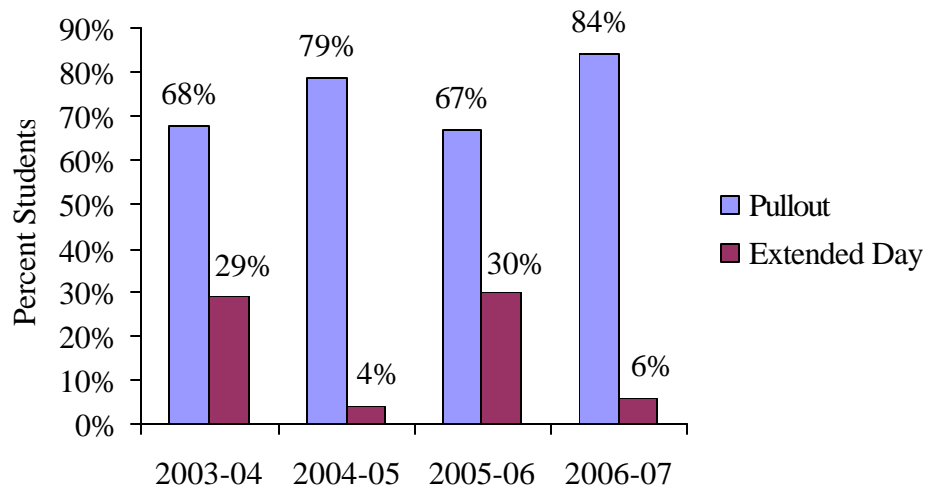
Previous evaluations of APS’ Title I Private School Program have recommended reducing pullout services and increasing extended day services. One suggested strategy was to consider pulling students out for Title I instruction during times when regularly scheduled content is not occurring. Respondents from only four schools answered the spring questionnaire item on extended day services. They cited the following barriers to increasing the amount of Title I services offered before and after school:

- Conflicts with other after-school activities,
- Lack of teacher availability,
- Transportation difficulties, and
- Parent refusal.

⁵ U.S. Department of Education. (2003, October 17). *Title I Services to Eligible Private School Children Non-Regulatory Guidance*. Page 21.

⁶ Snow, C.E., Burns, M.S., & Griffin, P. (Eds.). Committee on the Prevention of Reading Difficulties in Young Children (1998). *Preventing Reading Difficulties in Young Children*, National Research Council, 272. Retrieved April 21, 2008 from http://books.nap.edu/openbook.php?record_id=6023&page=272

Figure 2. Percentages of Private School Students in Pullout and Extended Day Programs: 2006-07 Compared to Previous Years (K-8th graders only).

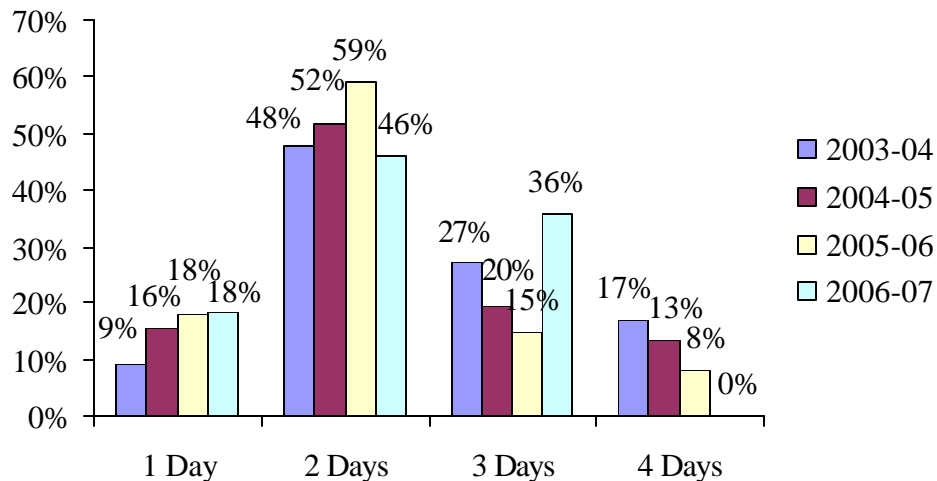


Frequency and Duration of Instruction

Research suggests that instructional intensity, including both frequency and duration, is a powerful predictor of supplemental reading program success.⁷ The Committee on the Prevention of Reading Difficulties in Young Children recommends that supplemental literacy instruction should occur on a daily basis for most or all of the school year to have the greatest impact.⁸

During 2006-07, almost half of private school students (46%) received two days per week of Title I instruction. As shown in Figure 3, another third received Title I instruction three days per week, and 18% received one day per week. Compared to previous years, a higher proportion of students received three days per week of Title I instruction in 2006-07. However, no student received more frequent instruction. This punctuates a steady decline from 2003-04, when 17% of students received four days per week of Title I instruction.

Figure 3. Percent Students by Number of Days per Week of Title I Instruction, 2006-07 Compared to Previous Years (K-8th graders only).

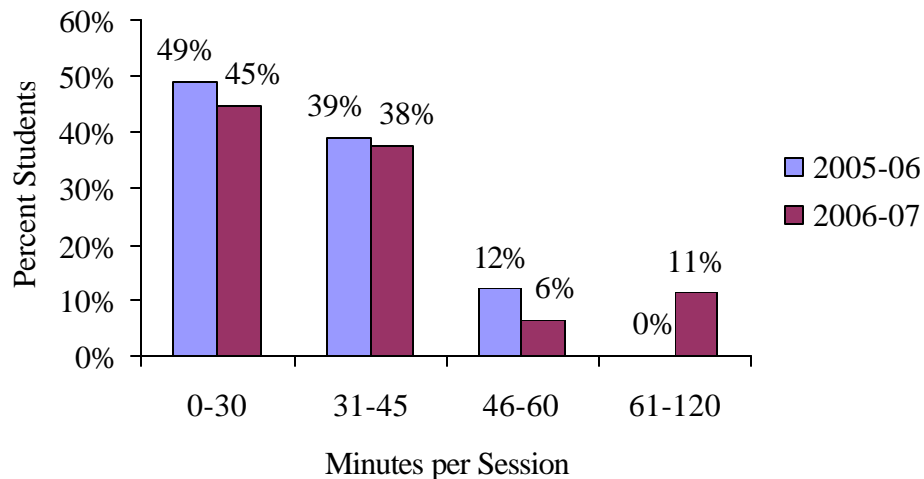


⁷ Elbaum, B., Vaughn, S., Hughes, M.T., & Moody, W.W. (2000). How effective are one-to-one tutoring programs in reading for elementary students at risk for reading failure? A meta-analysis of the intervention research. *Journal of Educational Psychology*, 92(4), 605-619.

⁸ Snow, et.al. (1998). 272.

The length of instructional sessions is another important dimension of instructional intensity. During 2006-07, the length of Title I instructional sessions varied greatly, both across and within schools. However, the breakdown by student remained fairly steady compared to 2005-06. As shown in Figure 4, the greatest proportion of students (45%) received 30 minutes of instruction or less per session. Just over one-third received between 31 and 45 minutes per session. Eleven students at two schools received between 46 and 60 minutes per session. Twenty students at one school, representing 11% of all students, received over one hour of services delivered in two segments (45 minutes of Wilson and 30 minutes of Fluent Reader).

Figure 4. Percent Students by Length of Title I Instructional Sessions, 2006-07 Compared to 2005-06 (K-8th graders only).



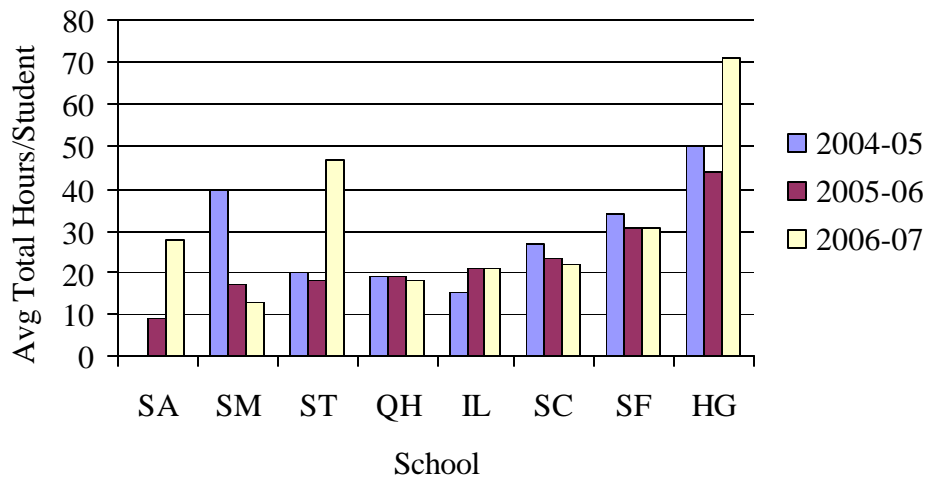
In their spring 2007 questionnaire responses, private school representatives cited the following reasons for not offering longer or more frequent Title I instructional sessions:

- Title I allocations were too small to support longer or more frequent sessions;
- Shorter or less frequent sessions were considered more effective and/or more developmentally appropriate; and/or
- Students objected to greater frequency.

Total Hours of Instruction

Private school students received an average of 27 hours of Title I instruction in 2006-07, up slightly from the previous year (24 hours). The total number of hours received per student varied greatly, ranging from 4 to 130 hours.⁹ By school, the total hours of Title I instruction delivered ranged from an average of 13 hours per student to an average of 71 hours. Except for one school, the total hours of instruction per student stayed about the same or increased considerably compared to 2005-06 (see Figure 5).

Figure 5. Total Hours of Title I Instruction Received on Average Per Student by School (K-8th graders only).



⁹ These figures include only students who participated in Title I services for the entire school year.

Annual Progress

The ‘annual progress’ goal set by private school and APS representatives was that at least eighty percent of Title I students would improve their reading comprehension and/or basic math skills by a minimum of 0.5 grade level equivalents. Eight of the nine schools that used Title I funds for direct instructional services provided RDA with test results from their regular testing programs. Table 3 lists the assessments used to measure annual progress in reading and in math, as well as the number of schools using each assessment.

Table 3. Annual Progress Goals, Assessments & Numbers of Students Tested, 2006-07

Annual Progress Goal	Assessments & (Number of Schools)	Number of Students with Pre- & Post-Test Scores
80% of Title I students will improve their <i>reading comprehension</i> skills by 0.5 grade level equivalents (GE’s).	STAR (5) Developmental Reading Assessment (1) Iowa Test of Basic Skills (2)	128
80% of Title I students will improve their <i>basic math</i> skills by 0.5 grade level equivalents.	STAR (2) Iowa Test of Basic Skills (2) Comprehensive Test of Basic Skills (1)	22

Most schools submitted pre-test information from the fall of 2006. The two schools that used the Iowa Test of Basic Skills submitted scores from the spring of 2006 as pre-test data. As a whole, schools submitted math pre- and post-test scores for 22 students who had received math, reading and math, or general tutoring services. Schools submitted reading pre- and post-test scores for 128 students who had received reading, reading and math, or general tutoring services.

These assessment results provide only a gross indicator of Title I program success. We cannot isolate the effects of Title I instruction from the effects of their regular classroom experience or from other education they may have received. Furthermore, because APS did not require private school Title I programs to use a consistent assessment, it is not possible to compare the results of different private school programs. Nevertheless, annual progress results do offer a way to identify private school Title I programs that may require monitoring and/or technical assistance.

As a whole, APS-sponsored private school Title I programs met the annual progress goals in reading and math during 2006-07.

- 80.5% of private school students receiving Title I reading instruction or general tutoring improved their reading comprehension skills by 0.5 grade level equivalents or more.
- 81.8% percent of students receiving Title I math instruction or general tutoring improved their basic math skills by 0.5 grade level equivalents or more.

Results by school suggest that some Title I programs may warrant review. Half of the schools (four out of eight) met the annual progress goal in reading. Three out of four met the annual progress goal in math. Table 4 shows the percentages of Title I students that improved their reading/language arts and/or math scores by 0.5 grade level equivalents or more, by school.

Table 4. Percentages of Title I Students Improving Reading and Math Scores by 0.5 Grade Level Equivalents or More, by Private School, 2006-07.¹⁰

School	Reading		Math	
	Percent	Number/ Total Tested	Percent	Number/ Total Tested
1	100%	26/26	100%	9/9
2	58%	18/31	NA	NA
3	75%	3/4	80%	4/5
4	68%	13/19	NA	NA
5	95%	20/21	NA	NA
6	NA	NA	NA	NA
7	88%	15/17	100%	3/3
8	75%	3/4	40%	2/5
9	83%	5/6	NA	NA
TOTALS	80.5%	103/128	81.8%	18/22

Data collected from private schools provide little insight about the factors that promote student achievement among Title I students. Crosstabular analyses reveal no clear relationships between annual progress achievement and the total amount, frequency or duration of Title I instructional services. Additional data regarding the nature of instruction would need to be collected to study the factors that promote and impede academic growth.

¹⁰ Students for whom schools did not specify a Title I instructional focus of math, reading, reading & math, or general tutoring are not included, nor are students who did not complete a full school year. Our Lady of Fatima is not included because it did not submit data. Our Lady's Assumption is not included because it did not use Title I funds to provide instructional services. St. Pius is not included because it used funds for assessment services.

Parent Involvement

Section 1118 of the Title I statute requires APS to provide equitable services to parents of private school participants using funds reserved off the top of its Title I allocation. The stated purpose is to help children achieve high academic standards. The October 2003 Non-Regulatory Guidance suggests the following parent involvement activities: written agreements between the LEA and parents, parent meetings, communications between Title I instructors and parents, parent-teacher conferences and parent education. The LEA must plan and implement activities in consultation with private school officials and parents.

APS' Title I resource teacher in charge of parent involvement met with private school officials at least four times during 2006-07. She also held 8 parent meetings and one informational meeting. The meetings provided opportunities for teachers, educational assistants, parent liaisons, and parents to collaborate, share ideas, and get information about reading, math and parent programs, speakers and strategies for maximizing parent involvement. APS' Title I resource teacher also clarified Title I guidelines and expectations for parent involvement.

APS allocated \$1,000 per school for parent involvement activities in 2006-07. These funds supported the purchase of food, supplies, books and speakers for parent meetings, as well as postage and paper. According to RDA's spring questionnaire, most private schools held between two and four parent meetings during 2006-07. One school reported zero meetings and one school reported five. School representatives reported that between ten and 200 parents/guardians attended their meetings, for a per-school average of 74 parents/guardians per year notably higher than the 2005-06 average of 19.

Professional Development

APS is required to provide equitable professional development services to teachers of private school Title I students. Funds must come from the Title I-A professional development set-aside and must be proportional to the number of private school children eligible for Title I funding. Professional development activities should address increasing knowledge, skills and abilities of teachers who serve Title I students. Professional development could include providing information on research-based reading and math instruction. Title I funds also may be used to pay for the stipends of private school teachers so they can participate in professional development activities. The cost of training Title I teachers who are employees of APS, however, must be paid from the funds reserved for the professional development of APS teachers.¹¹

APS allocated a total of \$12,387 for Title I professional development in 2006-07. School allocations ranged from \$329 to \$2,774, depending on the size of each school's Title I-A eligible population. Representatives from nine of ten private schools specified how they used these funds on RDA's spring questionnaire. Seven schools used the funds to send staff to conferences and trainings on topics including Scholastic assessment, BER Kindergarten, classroom management, English Literature, Special Education laws, SQS, and on-site reading strategies workshops. Three schools used the Title I-A professional development funds to purchase materials such as professional development books and items for learning centers and differentiated instruction. These materials were used to implement the professional development trainings that were given by the APS Private School Instructional Coach.

¹¹ U.S. Department of Education. (2003, October 17). *Title I Services to Eligible Private School Children Non-Regulatory Guidance*. Page 30.

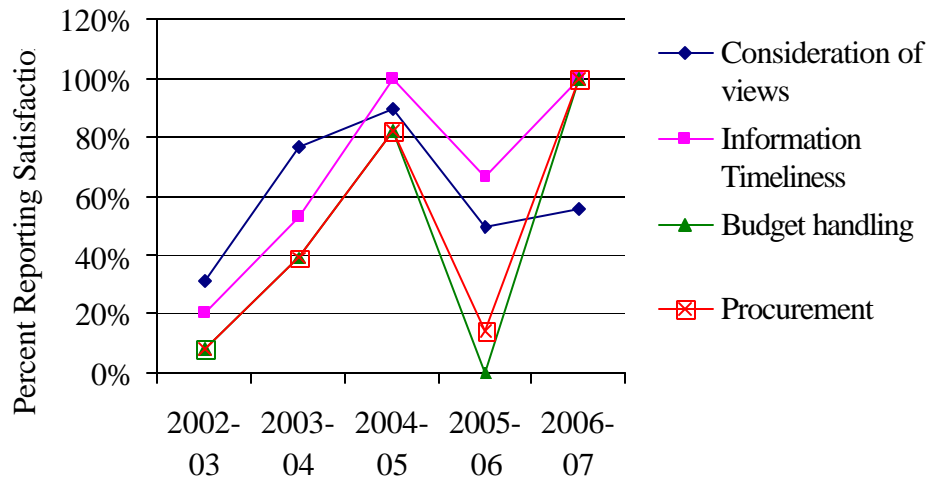
Private School Satisfaction

APS' Title I office began working to reestablish positive relations with private schools in the fall of 2003, after federal changes and APS staffing and accounting problems compromised Title I services for private school students. To measure the effects of APS' efforts, RDA has asked private school officials to complete a questionnaire on five occasions since the fall of 2003.

1. In September 2003 private school officials expressed very low levels of satisfaction with APS' Title I program during the 2002-03 school year.
2. In April 2004, questionnaire results showed improved satisfaction and understanding among private school officials during 2003-04.
3. In April 2005, results indicated almost universal satisfaction with APS' handling of Title I affairs during 2004-05.
4. Results from the May 2006 questionnaire showed sustained satisfaction with most aspects of Title I management during 2005-06, but less satisfaction in the following areas: consideration of private school views and interests, information timeliness, budget loading and procurement (purchases and budget transfers).

Results from the April 2007 questionnaire indicate a rebounding of satisfaction up to or beyond 2004-05 levels in almost all areas. Satisfaction reached 100% in three of the most troublesome areas identified in 2005-06, when only 67% reported satisfaction with information timeliness, zero respondents expressed satisfaction with budget loading, and only 14% were satisfied with purchases and budget transfers (see Figure 6). Satisfaction remained high on most other issues, including APS' accuracy and completeness of information, quality of administrative support, and responsiveness to needs. In addition, almost all private school officials reported a solid understanding of NCLB requirements and operations, and comfort with the definition of 'annual progress', as seen in Table 5.

Figure 6. Private School Satisfaction with APS' Handling of Selected Title I Program Affairs: 2002-03 to 2006-07.



Room for improvement appears to exist in two areas. As shown in Table 5, only about half of private school representatives said they think APS takes private school views and interests into account when making decisions about programmatic and budgetary issues related to private schools, hardly higher than in 2005-06. In addition, fewer representatives than in 2005-06 felt they understood how APS calculates funding allocations for private school Title I programs.

Table 5. Percent Private School Representatives Expressing Agreement with Selected Aspects of Title I Private School Program Management, Spring 2007.

Questionnaire Item	2005-06	2006-07
APS takes private school views and interests into account...	50%	56%
I understand how APS calculates funding allocations for private schools.	100%	70%
I know what the NCLB requirements are for private schools.	83%	100%
I am comfortable with this year's definition of 'annual progress.'	85%	91%
Evaluation and reporting needs are clearly communicated.	86%	100%

Conclusions & Recommendations

In 2006-07, APS sponsored eleven individual private school Title I Part A educational programs, reaching 176 students with supplemental instruction, 111 students with computer-based reading assessment, and 29 students with counseling services. The mutually agreed-upon goal of these programs was to improve the reading comprehension and/or basic math skills of at least 80 percent of Title I students by a minimum of 0.5 grade-level equivalents (GE).

As a group, the annual progress goal was met in both reading and math. Looking at individual school programs, however, suggests a different conclusion. At half of the private schools with Title I direct instructional services, fewer than 80% of students receiving Title I instruction grew more than half a grade-level in reading. Underscoring this outcome is that fact that a 0.5 GE target is a very modest expectation, as suggested by private school representatives themselves.

Crosstabular analyses reveal no clear relationships between annual progress achievement and the total amount, frequency or duration of Title I instructional services. Nevertheless, as many school officials note, small Title I allocations force programmatic compromises. The average student received 27 hours of instruction over the course of the year. Most students received two days per week of instruction or less. Furthermore, almost always this instruction was delivered during the regular school day, rather than as an extension to the school day.

Evaluation results suggest that the following issues require attention:

1. Starting services at the beginning of the school year

- Title I services at 7 schools started in August or September, 1 started in November and 3 had unknown start dates.
- Title I statute requires the Title I program for private school students to begin at the same time as the Title I program for public school participants.

2. Establishing adequate scope, intensity and duration of services

- Title I statute and research indicate a need to increase the frequency of supplementary instructional services and expand extended day services.
- Evaluators may wish to expand data collection to include whether students are pulled from core academic content or from other activities.
- APS may need to develop a policy or set of principles to guide decision-making for the use of small allocations. Some schools choose to provide many hours to a few targeted students, while others provide fewer hours to many students. Some use small allocations for non-instructional services like counseling.

- Pooling resources for a coordinated Title I private school program, with a common curriculum and consistent assessments, should be considered as a way to maximize cost-effectiveness and more closely meet federal expectations.

3. Defining and measuring Annual Progress

- Title I statute states that the LEA must measure the progress of private school students toward state standards or standards comparable to ‘high levels called for by the State’s student achievement standards.’
- The 2006-07 annual progress goal of increasing student achievement by half a grade level is very modest, yet half of the private school programs did not meet it.
- Setting an appropriate annual progress goal is connected to the challenge of establishing adequate scope, intensity and duration of services in the context of limited funds.

4. Ensuring that service reports are provided by all participating private schools

- One private school received Title I funds but did not provide any report of services. To ensure accountability and maximize APS’ understanding of program reach and effectiveness, the Title I program office may need to develop procedures to ensure full reporting.
- Title I statute requires APS to evaluate the effect of non-instructional services, such as counseling, on student achievement. Existing procedures should be reviewed. New measures may need to be developed.

5. Clarifying eligibility and funding allocation processes

- Responses to RDA’s spring questionnaire suggest that some school representatives may not understand where to find the full list of students eligible for Title I services.
- 70% of officials said they don’t understand how APS calculates funding allocations.
- Eligibility and funding allocation processes are inherently complicated and confusing and therefore warrant consistent communications and regular clarification.

6. Establishing clear expectations for consultation

- Private school officials reported satisfaction with the way APS handled most Title I program affairs. Satisfaction with budget loading and procurement increased markedly.
- On the other hand, over half (56%) of officials believe that APS does not take private views into account when making programmatic and budgetary decisions.
- APS program staff may wish to engage private school officials in a discussion to clarify expectations and devise mutually agreeable consultation strategies. The challenge is to consult while also meeting the federal expectation that ‘the LEA is responsible for planning, designing *and* implementing the Title I program and may not delegate that responsibility to the private schools or their officials.’¹²

¹² U.S. Department of Education. (2003, October 17). *Title I Services to Eligible Private School Children Non-Regulatory Guidance*. Page 21.