

Milwaukee Public Schools Title Program Participation  
Under the 2001 Reauthorization of the Elementary and  
Secondary Education Act (ESEA), known as The No Child  
Left Behind Act of 2001 (NCLB)

# Milwaukee Non-public School ESEA Title Program Handbook:

A participant's guide



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## Title Program Guidelines for Milwaukee Non-public Schools

### 1. Abbreviations used in this document

- 1.1. **BPSST:** December 2003 USED pamphlet called The No Child Left Behind Act of 2001: Benefits to Private School Students and Teachers. Available from Address: Office of Innovation and Improvement; Office of Non-Public Education; U.S. Department of Education; 400 Maryland Avenue, SW; Washington, DC 20202; Phone: (202) 401-1365; Fax: (202) 401-1368.
- 1.2. **DPI:** The Wisconsin Department of Public Instruction is the Wisconsin agency charged with oversight for the state's K-12 public school programs. DPI officials guide and monitor LEA compliance with NCLB.
- 1.3. **ELL:** English Language Learners, for Title program purposes, are students who are functioning below grade level in core academic areas due to their status as English language learners. By definition, no student performing on grade level in English can get an ELL designation, and not all students who are performing below grade level may be doing so because English is their second language. In order to participate in Title III programs for ELL students, schools must have concentrations of same language ELL students at one site per DPI guidelines. For more information, see this handbooks description of Title III.
- 1.4. **ESEA:** The Elementary and Secondary Education Act is the 1965 law that established Federal "Title program" funding.
- 1.5. **LEA:** A Local Educational Agency is the entity designated to oversee state or federal programs at the school district level. Under Title programs, LEAs are required to provide written "assurances" that they (and, by extension, all participating local schools) will comply with all Title program mandates. Title funds are distributed directly to states. In Wisconsin, the Department of Public Instruction (DPI) distributes Title funds to school districts to administer for all students (wherever they are enrolled) residing within the district. Milwaukee Public Schools (MPS) serves as the "Local Educational Agency" (LEA) under No Child Left Behind (NCLB) for City of Milwaukee resident students.
- 1.6. **MPS,** The Milwaukee Public Schools is the LEA for Federal Title programs for City of Milwaukee resident students (including those not enrolled in public schools).
- 1.7. **NCLB:** No Child Left Behind is the name for the 2001 reauthorization of ESEA.
- 1.8. **RFP:** A Request for Proposals is a document seeking competitive offers from providers of goods or services. RFPs outline specific requirements of the offerer. Responses go through a formal review and scoring process. RFPs become the basis for contractual arrangements made with accepted vendors. MPS uses an RFP process to identify its Title IA service providers for non-public schools. Non-public school parents and staff members have served on these RFP review team.
- 1.9. **USED:** The United States Department of Education is the federal agency charged with implementation of NCLB.

## 2. Milwaukee Title Program Terms, Concepts and Features

- 2.1. **Annual Non-public School Title Program Affirmation of Consultation Survey:** Non-public schools must indicate interest in participating in each Title program at the time of the Annual Milwaukee Public Schools Private School Affirmation of Consultation Survey. In Milwaukee, the survey period will take place between Thanksgiving and the end of the year. MPS uses local, state and federal databases of local non-public schools to conduct the survey. Non-public schools are advised to keep contact information current with the MPS Office for Non-public School Title Program Coordination.
- 2.2. **Consultation:** According to BPSST (pages 2 and 3), “The Uniform Provisions contain requirements for timely and meaningful consultation between appropriate public and private school officials. The goal of the consultation process is to design and implement a program that will provide equitable services and meet the needs of eligible private school students and/or teachers and other education personnel. Consultation between the entity receiving federal financial assistance and private school officials must occur before any decision is made that could affect the ability of private school students, teachers and other education personnel to receive benefits under ESEA and must continue throughout the implementation and assessment of activities. Consultation must include discussion on such issues as:
- How children’s needs will be identified
  - What services will be offered
  - How and where the services will be provided
  - Who will provide the services
  - How the services will be assessed, and how the results of assessment will be used to improve those services
  - The amount of funds available for services
  - The size and scope of the services to be provided; and
  - How and when decisions about the delivery of services will be made.

In addition, a thorough consideration of the views of private school officials on the provision of contract services through potential third-party providers must take place, and, where the entity receiving assistance disagrees with the views of the private school officials on the provision of services through a contract, the entity must provide a written explanation of the reasons why the entity has chosen not to use a contractor.” (See Section 10 of this document for information about how MPS and participating non-public schools address consultation issues described here.)

- 2.3. **E-mail Listserv:** A Milwaukee non-public school Title program listserv is available to facilitate communication between and among public and private school staff members and other interested parties. A listserv allows a message sent to one e-mail address to go to all subscribers to the list. An e-mail reply can be framed for individuals in the list or addressed to the group. The listserv facilitates MPS’s efforts to engage in ongoing consultations with non-public schools. It allows low cost, high-speed communication on issues of common interest. To join the listserv, send an email request to [requests@lists.milwaukee.k12.wi.us](mailto:requests@lists.milwaukee.k12.wi.us). The sending email account will be added to the listserv unless the body of the message indicates one or more other email accounts to be added to the list.
- 2.4. **Enrollment and Poverty Verification:** Initial Title program allocations are based upon school enrollment and poverty data from the previous year. As the LEA responsible for administration of Title funds for Milwaukee students, MPS is empowered by law to collect enrollment and poverty data for participating non-public schools. MPS collects school poverty counts as well as individual student names, addresses, phone numbers, parent names and birth dates for all schools participating in Title programs. This information is used to confirm accuracy of information submitted by schools. School

enrollment counts may also be used in school census data collection. Documentation related to school poverty claims is reviewed by MPS officials during periodic site visits to non-public schools. School officials who willfully misrepresent enrollment or poverty data presented in connection with Title program participation are liable for criminal prosecution.

- 2.5. **Equitable Participation:** According to BPSST, (pages 2 and 3), "...LEAs (as) entities receiving federal financial assistance are required to provide services to eligible private school children, teachers and other personnel ... These services and other benefits must be comparable to the services and other benefits provided to public school children and teachers participating in the program and they must be provided in a timely manner. To ensure equitable participation, the LEA must assess, address and evaluate the needs of private school students and teachers; spend an equal amount of funds per student to provide services; provide private school students and teachers with an opportunity to participate in activities equivalent to the opportunity provided public school students and teachers; and offer services that are secular, neutral and non-ideological." Equitable participation for Non-public schools in local Title programs is determined by Title. Here is how funds are set aside for Milwaukee non-public schools under each Title:
- 2.5.1. **Under Title IIA** the number of K4 through 12th grade students enrolled in participating City of Milwaukee non-public schools is added to the number of those students who are from families with low incomes. This total is compared with the same figures for Milwaukee Public Schools. Private school equitable participation percentage matches the percentage of all students in this count that are served by private schools. See [Appendix C](#) for examples.
- 2.5.2. **Under Title IA**, the number of Milwaukee resident students from low-income families and in grades K5 through age 17 are counted for both public and private schools. (Title IA counts may only include students who are 17 or younger at the date of the count.) Equitable participation for private school students is determined by the percentage of students in the count who are attending private schools. See [Appendix A](#) for examples.
- 2.5.3. **Under Title III**, the number of students who qualify as "English Language Learners" (ELL) at non-public schools is compared with the number of ELL students enrolled at public schools. After any allowable deductions the percentage set aside for non-public schools matches the percentage of city residents that they serve. ELL students are all identified in state ACCESS testing.
- 2.5.4. **Under Title IID**, seats in available programs are reserved for teachers from non-public schools based upon the percentage of Milwaukee resident students served at Title IID participating non-public schools.
- 2.5.5. **Under Title IV**, schools will be selected to participate in one of the research based programs in a rubric scored competitive grant process. To learn more about Title IV Safe and Drug Free Schools programs, visit the MPS non-public school web site. The percentage of non-public school participants will be based upon the percentage of Milwaukee students being served by schools expressing interest in Title IV participation.
- 2.6. **Separate, Secular and Non-ideological:** Goods and services purchased with Title funds remain the property of the MPS. Participating non-public schools are required to label Title program materials "Property of Milwaukee Public Schools Title Programs" and to maintain an inventory of such materials. These materials may not be used to advance religious or ideological positions that would not be allowed in public schools.

Materials purchased with Title IA funds are further restricted in their use. They may only be used by MPS employed Title IA teacher or Title IA service provider staff and they may only be used with Title IA eligible students who are currently enrolled in the Title IA program. These materials are kept in a separate inventory by Title IA service providers. While Title IA service providers engage in ongoing consultation related to purchases made to support local school programs, final authority over decisions about materials to be purchased is held by MPS. Materials purchased for a particular school program are purchased for the use of that program only as long as MPS determines that they are useful for that program. Such materials may be reallocated at the discretion of MPS.

Title IA service providers are required to maintain the separate, secular and non-ideological nature of their instructional programs as well. As a result, “team teaching” instructional models with non-public school staff members are not allowed and religiously neutral instructional spaces are preferred.

- 2.7. **Supplementing vs. supplanting:** Title program funds in non-public and “Targeted Assistance” (see below) schools are designed to supplement school programs to promote student achievement. This means that they are to provide extra resources for school programs, not things considered necessary elements of a school’s academic program. Guidance on what expenditures may be considered “supplemental” varies from Title to Title. Here are some Title specific examples.

2.7.1. Under Title IA:

2.7.1.1. Paying for Title student assessments would generally supplement a school’s Title IA program, but the same purchase would be supplanting a school’s role if all non-Title IA students had the same purchase made for them by the local school.

2.7.1.2. Title IA instruction itself must be supplementary. While a Title IA teacher might work with a small group of students in regular reading lessons, those lessons must be in addition to the reading program offered by the school. Offering the same Title IA instruction in place of the school’s regular reading program would be an example of supplanting the role of the school.

2.7.1.3. Title IA funds might be used to pay for a speaker and refreshments at a parental involvement event to be attended only by families of Title IA students, but Title program funds could not be used to pay a portion of a school wide family event, even if that event were to include the same portion of Title IA families.

- 2.8. **Title IA Targeted Assistance:** Title IA programs are allowed to provide only “targeted assistance” at non-public schools. Targeted assistance requires service in core academic areas for students determined to have the greatest academic needs at each school. The targeted assistance focus is on service to participating students, their families and the staff members who work directly with Title IA students, not on service to the school itself. Under no circumstances may Title IA services be extended to all or nearly all of the students in a non-public school.

- 2.9. **Uniform Provisions:** Title IA X, sections 9501-9504 of the ESEA is often referred to as the “Uniform Provisions.” According to BPSST (page 1), This section of ESEA governs, “...the participation of private school students, teachers and other education personnel in some ESEA programs providing services to this population.... Three of these programs contain their own provisions for the equitable participation of private school students and teachers, which differ, in some respects, from the Uniform Provisions. These are: Title I, Part A, Improving the Academic Achievement of the Disadvantaged; Title V, Part A, Innovative Programs; and Title V, Part D, Subpart 6, Gifted and Talented Students.”

### 3. Overview

- 3.1. **About this handbook:** Within limitations set by NCLB, legal precedent and federal and state guidance, LEAs are required to work with local stakeholders to design and implement NCLB. This handbook is designed to facilitate MPS's work with non-public schools that serve eligible students.
- 3.2. **About ESEA/NCLB:** The Elementary and Secondary School Act was originally passed in 1965. It set out to provide resources to meet the needs of educationally deprived children. It recognized the educational needs of low-income families and the impact that concentrations of low-income families have on the ability of local educational agencies (LEAs) to support adequate educational programs. ESEA "Chapters" or "Titles" described particular initiatives outlined in the law. This led to the practice of referring to particular programs by their Title designations. Legislative reauthorizations, Federal and state guidance, court rulings and local decision making have all served to shape these Title programs since 1965. The most recent reauthorization of ESEA is referred to as the "No Child Left Behind Act of 2001".
- 3.3. **About Non-public School Participation:** NCLB, according to the December 2003 USED pamphlet called The No Child Left Behind Act of 2001: Benefits to Private School Students and Teachers, (page 1), NCLB, "...provides benefits to private school students, teachers and other education personnel, including those in religiously affiliated schools. These services are considered to be assistance to students and teachers and not to private schools. The reauthorized ESEA requires the equitable participation of private school students, teachers and other education personnel in some of its major programs."
- 3.4. **About Non-public School Eligibility for Title Program Participation:** Under Title IA, MPS provides services for Milwaukee resident students where ever they attend school. Under all other ESEA Titles, MPS provides services only for schools that are located within the City of Milwaukee.

### 4. About Individual Titles

- 4.1. **Title IA, Improving the Academic Achievement of the Disadvantaged:** According to the USED BPSST pamphlet cited above (page 3), "Title I, Part A, provides supplementary instruction by public school teachers or through a third-party contractor to students who are educationally disadvantaged and failing or most at risk of failing to meet high academic standards, and who live in areas of high poverty. Instruction may take place during the school day, before or after school, or in the summer. Title IA services may be provided on site at the private school, including religiously affiliated schools, or at other locations..... Private school students who reside within a Title IA attendance area and who are failing or most at risk of failing to meet high academic standards are eligible for services. Services may include a targeted, assisted pullout model, supplementary instruction, direct instruction, computer-assisted instruction, tutoring, counseling, family literacy and early childhood programs. In addition, the law requires equitable participation of private school teachers of Title IA students in professional development activities and of parents of Title IA students in parent involvement activities." The BPSST brochure goes on to point out that Title IA is not governed by many of the "Uniform Provisions" that govern other Federal Title programs. Title IA has its own requirements. Title IA programs in private schools must be "Targeted Assistance" programs that focus Title IA interventions on selected students and their private school teachers and their families.

**Note** that while Title IA allocations are related to the number and concentration of low income families in schools, eligibility for Title IA service is not related to family income at all. Eligibility for Title IA

service in targeted assistance programs is dependent on a student's residence within the LEA providing the services, grade and age criterion (K5 through age 17), and student academic performance ("failing or most at risk of failing to meet academic standards"). Targeted assistance programs do not generally serve all students in a school who might be eligible for services. Only those who actually do receive the Title IA services are classified as "Title I" students.

- 4.1.1. **Title IA, American Recovery Reinvestment Act of 2009 (ARRA):** In the American Recovery Reinvestment Act (ARRA) funds are set aside to be used to support research-based educational initiatives and goals. Title IA requires equitable participation of non- public schools. The same requirements and guidelines of Title IA, apply to Title IA ARRA.
- 4.1.2. **Third Party Title IA Service Providers:** In the spring of 2003, MPS decided, in ongoing consultation with Milwaukee non-public schools, to adopt a third party provider model for Title IA services to participating non-public schools. The district works with service providers who are selected during a "Request for Proposals" (RFP) period every three years. Non-public school staff members and parents are sought to serve with MPS personnel in the RFP review process. Milwaukee non-public schools are allowed to select their Title IA service through MPS or one of the designated providers (and no others). Providers contract with MPS to provide Title IA services. The most recent RFP and contract template for Title IA services to Milwaukee non-public schools is posted on the MPS non-public school Title program web site along with this handbook.
- 4.1.3. **Separate and Secular Title IA Services:** \*LEAs may not provide money directly to participating non-public schools to provide Title IA services. While this restriction may raise questions related to effective and efficient use of Title IA funds, it is not an item that is negotiable in ongoing MPS / non-public school consultations. Federal courts have decided that Title IA programs may only be run in non-public schools if they are strictly "separate and secular". This has meant that LEAs have been required to administer the programs directly.
- 4.1.4. **Limitations on uses of funds reserved for Title IA Parental Involvement Activities:** Funds set aside for Title IA parental involvement in a Targeted Assistance program may only be used to support the families of students currently getting Title IA services. Such funds may never be used to provide services for families that would otherwise be provided by the Targeted Assistance school and they may not be used to pay a "Title IA share" of expenses for a school-wide parent event. Funds may be used to support parent capacity to support the education of their Title IA child. Allowable expenditures related to that support might be made for the provision of information or training (speakers, conference or workshop registration, duplicating, mailing costs, for example), incidental costs of refreshments or meeting space, child care, transportation, or educational materials or resources (take home reading materials or access to computer resources, for example) to be used by Title IA parents and students.
- 4.1.5. **Limitations on uses of funds reserved for Title IA Professional Development:** Funds set aside for Title IA professional development in a Targeted Assistance program may only be used to support the private school teachers and aides (not administrators) who regularly work with students currently getting Title IA services. The professional development provided for private school staff members must focus on the achievement needs of students currently getting service from the Title I service provider.
- 4.1.6. **Limitations on Service Delivery:** If enough money for an instructional program is available for a participating private school, then instruction is the first service that must be provided. Counseling

services may only be offered where the counseling will compliment the instructional program or in cases where there is enough funding to support counseling, but not enough to support an instructional program that meets contract requirements.

## **Non Public Counseling Services**

Counseling services are fundable under Title I only under the following conditions:

1. Funds generated for services to private school students is not large enough to provide instruction;
2. Counseling services may only be provided to the private school children who are eligible for Title I services, meaning those most at risk of academic failure;
3. Counseling service were determined to be the best and most needed service to improve academic achievement based on the needs assessment;
4. Counseling services provided through Title I do not supplant existing counseling services;
5. Counseling services do not take place in the regular classroom;
6. The counseling services must be evaluated in terms of their impact on student achievement. If the services are not improving achievement then other strategies must be considered.

**Each school requesting counseling must show data that supports this as an appropriate intervention as well as show data that it is working.**

## **Questions**

- 1) What **data** is used to determine that the counseling intervention is a need for the school?
- 2) What **evaluative tool** is used to determine which Title I students should receive counseling?
- 3) What counseling **services** do the students received? Academic, Behavioral, and/or Social
- 4) How do you **measure** overall success of the counseling service provided?
- 5) How do you **evaluate** the impact on student achievement?

**Please note that counseling services is not common because academic achievement is the purpose of Title I.** Therefore, the district is responsible for ensuring that the schools requesting this service have data that supports counseling as an appropriate intervention as well as data that shows it is working. It is not a one size fits all strategy.

When school allocations will not support minimal service levels for small group instruction, then the school may have the teachers of eligible students be supported with professional development as the Title I intervention. Since no direct student services are provided in such schools, parental permissions and student testing are not required, but to qualify for Title I professional development

in such cases, schools must submit eligibility information for students who *would* qualify for instructional services if a program could be offered.

- 4.1.7. **Limitations on Use of Title IA Staff and Materials:** Title IA staff members may only work with Title IA eligible students who are enrolled in the Title IA program with parental consent. While they may be expected to work cooperatively with local school staff members, they must remain employees of MPS or its contracted service providers. Title IA teachers may not be used as substitute teachers in non-public schools. Title IA staff members may not be assigned to such additional duties as recess, lunch or bus supervision or be expected to attend non-public school staff meetings unless agenda items have specific application to their work at the school. Title IA teacher schedules should provide regular, reasonable levels of non-student contact time to allow time for such things as record keeping, contacts with parents and non-public school staff members, and individual assessment with new or departing Title IA students.

Title IA materials may only be used by Title IA staff members and only with students who are enrolled in Title IA classes. Title IA staff members may let Title IA students use some Title IA materials outside of Title IA class time, but such materials may not be used (even with Title IA students) in an organized and consistent way by non-Title IA school personnel. For example, chapter books might be lent to Title IA students for use at home with a parent or for independent use at school, but non-Title IA staff could not use that Title IA resource in a study group, even if the study group consisted entirely of students currently getting Title IA service.

Such materials remain the property of MPS and are kept in an inventory by Title IA service providers. Though they may have been purchased with funds provided by a local school's allocation, such purchases only provide for the restricted use of Title IA materials. They may be removed from a school if MPS decides that they are no longer necessary or useful at the site for which they were originally purchased.

## 4.2. Title IIA, Preparing, Training and Recruiting High Quality Teachers and Principals

- 4.2.1. **Purpose:** According to USED's BPSST pamphlet (page 5), "The Teacher and Principal Training and Recruiting Fund provides assistance for preparing, training, recruiting and retaining high quality teachers.... Activities may include improving teachers' knowledge in the core academic subjects and effective instructional teaching strategies; technology integration training; teaching students with different learning styles; using assessments to improve instruction and student outcomes; involving parents more effectively; and education leadership development." Wisconsin defines "core academic subjects" as reading, language arts, math, science and social studies. Title IIA funds may not be used to support instruction in other curricular areas.
- 4.2.2. **Milwaukee Model:** In Milwaukee, the consultation process led to the adoption of a formula that provides non-public schools with allocations based upon both school need and enrollment of City of Milwaukee resident students. (School need is determined by poverty data.) Participating schools may access a wide variety of professional development resources, though such resources must be pre-approved by and paid for directly by MPS, since no Title program funds may ever go directly to non-public schools. MPS does not pre-pay for professional development goods or services (MPS may reimburse individuals who present timely and required documentation).

### 4.3. Title IID, Enhancing Education Through Technology

- 4.3.1. **Purpose:** According to USED's BPSST pamphlet (page11), "The Enhancing Education Through Technology program provides funds for innovative initiatives to support the integration of education technology into classrooms to improve teaching and learning. Activities include professional development in technology integration and the use of the Internet; distance learning initiatives; acquiring education technology; and using technology to enhance parental involvement."
- 4.3.2. **Milwaukee Model:** In Milwaukee, Title IID offers professional development opportunities for certified teachers at non-public schools. Call 438-3611 with questions about programs described below.
- 4.3.2.1. Funds are available to reimburse Milwaukee area teachers, both public and nonpublic, for tuition and fees after successful completion of online graduate courses offered through the Learning Technologies division of the Department of Academic Excellence of the Milwaukee Public Schools. Courses are planned for fall, winter and summer sessions. Seats in courses will be held for non-public participants based upon equitable participation guidelines. Information about course and mini-grants are made available each year on the MPS web site.
- 4.3.2.2. Instructional Technology Leadership Opportunities - Private Schools may have "Instructional Tech Leaders" participate in ongoing development around effective uses of tech to promote academics. Participants may have access to "mini-grant" projects
- 4.3.2.3. Enhancing Ed through tech (EETT) for 6<sup>th</sup> grade teachers, who get ongoing assistance in use of tech resources to support student achievement. Each participant gets a laptop and digital projector to use at their school while they participated.

### 4.4. Title III, Part A—English Language Acquisition, Language Enhancement and Academic Achievement

- 4.4.1. **Purpose:** According to USED's BPSST pamphlet (page12), "The English Language Acquisition, Language Enhancement and Academic Achievement program provides funds for helping limited English proficient (LEP) children attain English proficiency and meet the same challenging state academic standards as all children are expected to meet. Funds must be used for increasing the English proficiency of LEP children by providing high-quality language instruction and high-quality professional development. Private school students and teachers whose schools are located within an LEA that receives a sub grant from the state are eligible to participate in this program."
- 4.4.2. **Milwaukee Model:** MPS uses State Statute 115.97 to determine Title III program participation for public and non-public schools. According to statute, participating schools must have (in the same building): 10 or more Limited English Proficient (LEP) students in K5 to grade 3 and in the same language group; or 20 or more LEP students in grades 4 to 8 or 9 through 12 in the same language group.

Schools that request Title III participation must work with MPS to identify their English Language Learners (ELL) based upon State of Wisconsin procedures. Wisconsin requires the use of family language surveys, a screening instrument and ACCESS testing to identify LEP students. Testing is required during a state mandated testing window. Private school equitable participation is based upon the percentage of ELL students being served by private schools. Title III funding for

qualifying schools is based upon the number of students identified in a school in the previous school year.

4.4.3. **Uses of Title III Funds:** Title III funds may be used for both materials and professional development to support the education of ELL students. The Title III section of the non-public school web site contains a document that suggests some resources that may be used to support ELL students.

4.4.4. **Title III Questions:** The MPS Title III office may be contacted at 475-8091 if schools have questions related to particular Title III related questions.

4.4.5. **Services from MPS:** Participating non-public schools may use Title III funds purchase services from the MPS Title III office.

4.4.6. **Making Title III Requests:** In the “Justify/Explain” portion of the MPS Title Program request form, schools should note that the request comes from the suggested list or that the MPS Title III office has approved the expenditures.

#### 4.5. **Title IV, Safe and Drug-Free Schools and Communities:**

4.5.1. **Purpose:** According to USED’s BPSST pamphlet (page13), “The Safe and Drug-Free Schools and Communities Act supports programs that foster a safe and drug-free learning environment. Authorized activities include drug, violence and suicide prevention programs; professional development and training; developing school security plans; conflict resolution, community service and character education programs; family involvement activities; counseling; mentoring; and emergency intervention services. The Uniform Provisions for the equitable participation of private school students apply to programs authorized under the Safe and Drug-Free Schools and Communities Act, including the competitive grant programs awarded directly by the Department.”

4.5.2. **Milwaukee Model:** Milwaukee non-public schools may participate in research based, pre-approved Title IV activities. Information about these programs may be found in the Title IV section of the MPS non-public school Title program web site. A competitive grant process will allow both public and non-public schools to apply to participate in MPS supported Title IV programs. Grant applications will be rubric scored with Non-public participation will be based upon the percentage of Milwaukee students served by non-public schools expressing an interest in Title IV participation.

4.5.3. **Contact the MPS Title IV Office:** The MPS Title IV office may be contacted at 475-8057.

**5. Allocation of Title Program Funds for Non-public Schools:** Individual non-public school allocations are based on formulas that reflect the requirements of ESEA/NCLB and ongoing consultation with non-public school participants. Allocation methods differ from Title to Title. See Appendix C for more information.

#### **5.1. Under Title IIA**

5.1.1. Only schools located within the MPS LEA may participate in Title II Part A through MPS.

5.1.2. Allocations are awarded based upon the total K5- 12 number of students enrolled in each school.

5.1.3. Non-public school consultation led to the following formula to determine school needs.

- 5.1.3.1. The private school equitable participation is based on all students enrolled in each school.
- 5.1.3.2. The per student allocation is calculated by dividing the T2A funds allocated for professional development by the total number of students in public and private schools. The allocation of each private school is calculated by multiplying the per student allocation by the total number of students of each private school. For example if a school has 95 students and the per student allocation is \$12, then the allocation of this private school is  $12 \times 95 = \$1140$ . The sum of these numbers becomes the schools allocation enrollment". (For example, if a school had 50 low income students and a total enrollment of 95, that school's allocation enrollment would be 145.)
- 5.1.3.3. The allocation enrollments of all participating non-public schools are totaled.
- 5.1.3.4. The total non-public allocation enrollment is divided into the amount of money available under equitable participation to get a per pupil amount for each Title.
- 5.1.3.5. The per pupil amount is multiplied times the total enrollment of the school to determine allocations.

## **5.2. Under Title IA,**

5.2.1. Allocations are based upon the number and concentration of students who:

- 5.2.1.1. Come from low-income families (as determined by federal free and reduced lunch guidelines or an equivalent measure)
- 5.2.1.2. Are in grades K5 to 12, (below age 18 on the date of the count) and
- 5.2.1.3. Live in the City of Milwaukee.

5.2.2. MPS may provide Title IA services at schools that serve low income Milwaukee residents, even if the schools are not located within the LEA. See Appendix A. for more Title IA allocation information.

**5.3. Under Title IID,** seats in selected graduate level courses and other Title IID programs are reserved for teachers from non-public schools based upon the percentage of Milwaukee resident students served at Title IID participating non-public schools. These seats are filled by non-public school personnel on a first come first served basis until a cut off date one week before the start of the course or activity. After that, remaining seats are filled by applicants from non-public or public schools. Participating schools must be located within the City of Milwaukee.

**5.4. Under Title IV,** schools completing an assessment and application process will be selected to participate in district identified research based programs. Selections will be based upon rubric based scores on grant applications, with the percentage of non-public school participants based upon the percentage of Milwaukee students served by non-public schools expressing an interest in Title IV participation. Participating schools must be located within the City of Milwaukee. This is the final year of Title IV, only schools that are in their second year of the grant will receive services.

## 5.5. Under Title III

- 5.5.1. Non-public schools participate in Wisconsin ACCESS testing process to identify ELL students in grades K to 3, 4 to 8 and 9 to 12.
- 5.5.2. Funds are generated by same-language-group ELL students in if there are 10 or more such students in grades K5 to 3 or 20 or more in either grades 4 to 8 or 9 to 12.
- 5.5.3. The number of eligible ELL students at each school is then multiplied times the per pupil amount to determine individual school allocations.
- 5.5.4. Participating schools must be located within the City of Milwaukee

## 6. Milwaukee Non-public School Access to Title Program Resources: How to Make Title Program Requests

- 6.1. **Milwaukee Non-public School Title Program Request Forms** are available at the MPS Non-public School Web Page at, [http://www2.milwaukee.k12.wi.us/title\\_i/Web\\_Pages/non-public.html](http://www2.milwaukee.k12.wi.us/title_i/Web_Pages/non-public.html). These forms may be used to request expenditures under Titles IB (Reading First), IIA, and III. Other documents available at the web site noted above assist schools in
  - 6.1.1. tracking expenditures,
  - 6.1.2. keeping inventories,
  - 6.1.3. requesting stipend payments for staff members who participate in allowable and voluntary professional development during times when they are not being compensated by their schools.
  - 6.1.4. completing requests (including worksheets for school personnel to use and examples of different types of Title program requests.
  - 6.1.5. providing evaluation information,
  - 6.1.6. providing clarifying information related to requests.
  - 6.1.7. submitting requests where travel is involved.
- 6.2. **Annual ESEA Title Program Informational Meetings** - Non-public schools are very strongly encouraged to have the school representative responsible for processing Title program requests attend one of the annual district sponsored informational sessions related to Title program participation. (See Non-public School Title Program Calendar on the web page cited above for registration information.)
- 6.3. **Submitting Request Forms** Request forms must be sent to [requests@lists.milwaukee.k12.wi.us](mailto:requests@lists.milwaukee.k12.wi.us) as email attachments. Electronic submission allows the district to provide a reply that indicates that the message was received and to provide email feedback related to the request. The person authorized to approve Title program requests at the school must be named, and the email is considered an electronic signature that indicates that the named administrator made the authorization for the request. School officials should read and agree to the language found on the Title Program Request Forms before submitting a request (see below).

#### 6.4. Suggestions for avoiding delays or denials in processing of requests:

6.4.1. Make requests soon after receiving allocation information. Many requests submitted at or near deadlines are processed slowly because of the large number submitted at that time.

6.4.2. Provide complete and accurate information

6.4.2.1. name, address and phone of payee,

6.4.2.2. shipping costs must be addressed whenever shipping is involved – if shipping will be free, that information should be provided on the request form

6.4.3. When seeking stipends, use the MPS provided “worksheet for documenting stipends for multiple people and events”. The document is found at:

[http://www2.milwaukee.k12.wi.us/title\\_i/Web\\_Pages/non-public.html](http://www2.milwaukee.k12.wi.us/title_i/Web_Pages/non-public.html) with other Title program request related documents. The document seeks information that allows MPS to set up taxable payments. Personal information (full legal name, social security number, home address and current role in the school) for those for whom stipends will be requested should be sent early in the school year to facilitate payments.

When actual hours worked can be confirmed, MPS will need information about the work that was done and how the work will help the staff member(s) promote academic achievement in allowable areas in the work that they are currently doing for the school as well as an assurance that work was not an ordinary job expectation for the person being paid and that the work was voluntary and done during a time when that person is not compensated by the school.

6.4.4. Remember the minimum \$50 order requirement, and consider limiting the number of Title requests for small expenditures – each individual request needs to be tracked, checked in, labeled, inventoried, reported back to the district – fewer requests means fewer possibilities for error and creates much less work for schools and the district.

6.4.5. Remember ESEA Title funds may only be expended for purposes outlined in the law. Keep guidelines provided in this handbook in mind when considering requests.

6.4.6. Provision of complete documentation will speed the process considerably:

6.4.6.1.1. Orders for “tech” equipment must be accompanied by quotes from providers to help MPS order exactly what is desired by schools.

6.4.6.1.2. Vendor provided quotes will assist in processing of orders. Quotes that do not provide clear descriptions of items to be ordered should be accompanied by such a description.

6.4.6.1.3. Requests for payment of invoices (generally for professional development services) need to be accompanied by the invoice. If invoices will be mailed to MPS, they should contain a reference to the school served and the Title program request number assigned by the school.

6.4.6.1.4. Proofs of payment for individuals must clearly establish payment by the person in question, for the goods or services indicated. When such requests involve a participation component, a proof of participation must also be submitted. When

reimbursements are for college course work, grades should be submitted along with an official statement or letter from the provider. This statement should clearly connect the course work with the payment amount made by the person being reimbursed.

6.4.6.1.5. Requests are processed in the order of emails sent by participating schools. Questions about past requests should also be emailed to the [requests@lists.milwaukee.k12.wi.us](mailto:requests@lists.milwaukee.k12.wi.us) address to get schools into the cue for email responses.

- 6.5. **Reimbursements under Title IID** will be made through the MPS office sponsoring Title IID graduate level courses. For more information, call 438-3688 or email [opd@milwaukee.k12.wi.us](mailto:opd@milwaukee.k12.wi.us) or visit, [http://www2.milwaukee.k12.wi.us/title\\_i/Web\\_Pages/non-public.html#TitleIID](http://www2.milwaukee.k12.wi.us/title_i/Web_Pages/non-public.html#TitleIID). Teachers themselves are responsible for enrolling in and paying for Title IID courses. No Title program request forms need to be submitted by their school.
- 6.6. **Title IA Expenditures:** Non-public schools have consultation rights related to the use of local Title IA funds. Title IA mandates minimum expenditures for parental involvement and professional development. Amounts allocated in these categories are based upon the amount of Title IA expenditures MPS makes for public schools in these categories. Participating schools may work with Title IA service providers to develop plans for educational services, parental involvement, and professional development. To ensure the effectiveness of Title IA programs, service providers need ongoing school input on service model, scheduling, student eligibility and academic performance, as well as curricular decisions. Final decisions on Title IA expenditures are left up to the provider and, ultimately, MPS after consideration of local school input. However, Title IA expenditures must be made according to federal guidelines. Title IA service providers are required to keep inventories of all materials purchased with Title IA funds. Such resources may only be used by Title IA personnel with students who are currently getting Title IA service. Computers and software purchases must be cleared with MPS before purchases are made.
- 6.7. **Control of Title Funds:** Title program funds may never be sent directly to non-public schools or their sponsoring agencies.
- 6.8. **Non-public School Use of Title Program Materials:** Materials purchased with Title Program must support student achievement per the requirements of the Title being used. The benefit and use of Title program materials must be closely tied to students. Computers, for example, may be purchased for student use, but the same equipment may not be put to use to support core functions of the school in an administrative office or on a teacher's desk.

Milwaukee non-public schools submit Title program requests under Titles IIA, and III containing the following language:

“By authorizing this request, I am indicating that I am an administrator who is authorized to approve Title Program requests for my school, and that I am fully informed about and agree to the following Title Program limitations on the use of materials located in a private school. Materials will be used for secular, nonideological purposes only. School personnel will be informed as to these limitations. Equipment and materials will supplement and not supplant the materials that, in the absence of Title Program funding, would have been made available for participating students. I agree to label all equipment and materials “Property of Milwaukee Public Schools ESEA Title Programs” and to maintain a log to indicate the inventory of Title Program property as well as the locations within the

school where Title Program property is kept. Finally, I agree to periodic on-site monitoring from MPS personnel. Monitoring could include checks on uses of equipment and materials, discussions with private school officials, review of Title Program inventory or an audit of Title Program reporting.

I understand that MPS, as the Local Educational Agency for local Title funds, must provide assurances that parents and staff members at participating schools will be involved in the development of annual school needs assessments, plans and evaluations of Title Program expenditures. Our school agrees to involve parents and staff to assess local needs, develop plans for expenditures, to evaluate the effectiveness of our Title Programs and to share documentation related to these requirements upon request. Finally, I understand that expenditures may never be reimbursed directly to non-public schools or their sponsoring agencies and that non-public schools are responsible for financial commitments that exceed allocation limits or are denied based upon Title Program guidelines.”

If Title program materials wear out, a notation to that effect should be placed in the school inventory. Schools that are closing or no longer need Title program materials belonging to MPS should contact the MPS Non-public School Title Program Coordination office immediately at 414-475-8120 for a decision about their disposition. If the Title Programs materials are no longer needed, a notation to that effect should be placed in the school’s inventory. Contact the MPS Non-public Coordinator at 414-475-8120.

If materials purchased under any Title program are no longer needed by MPS, they may only be turned over to a non-public agency if they are purchased at fair market value or it is determined that they have no market value.

Under Title IA, the use of materials purchased with Title funds is much more restricted. Purchase decisions are made by MPS or its contracted Title IA service providers in consultation with participating schools. Materials are labeled “Property of MPS Title IA” and kept in inventories by the district or its third party service providers. Materials may be used only by Title IA employees of MPS or its third party providers, and only with students currently getting Title IA services. While individual school allocations may be used to purchase such materials, the allocations only purchase the restricted use of the materials for the period for which they are needed by the Title IA program at that school. They may be removed from the site at the discretion of MPS or its service providers. In cases where schools change Title IA service providers during the annual service provider selection period, decisions about the disposition of the Title IA inventory used at that school will be made on a case by case and item by item basis.

6.9. **Stipends** may be paid directly to non-public school staff members for participation in approved professional development activities.

6.9.1. Stipends may only be provided for work that:

- Is conducted during time when the staff member is not compensated by their school
- Is focused on promoting student achievement per relevant Title program guidelines, not on supporting core functions of the school (for example, stipends could not be provided for persons working on student schedules or learning how to use attendance software or getting professional development with religious content).
- Is not an ordinary expectation for a person serving in the role of that staff member (for example, a stipend could not be provided to an administrator conducting a staff meeting, even if the meeting had a professional development focus and was held outside of the regular work day)

- Is not required by the private school (By requiring attendance, a school makes participation a job expectation. Title funds may not be used to compensate for the things ordinarily expected of private school employees).

6.9.2. Social security numbers, home addresses and roles in school of staff members must be submitted with requests for payments that are not reimbursements for expenses related to Title program requests. Such payments are taxable. MPS when seeking stipends, use the MPS provided “worksheet for documenting stipends for multiple people and events”. The document is found at: [http://www2.milwaukee.k12.wi.us/title\\_i/Web\\_Pages/non-public.html](http://www2.milwaukee.k12.wi.us/title_i/Web_Pages/non-public.html) with other Title program request related documents. The document seeks information that allows MPS to set up taxable payments. Personal information (full legal name, social security number, home address and current role in the school) for those for whom stipends will be requested should be sent early in the school year to facilitate payments.

When actual hours worked can be confirmed, MPS will need information about the work that was done, hourly rate requested and how the work will help the staff member(s) promote academic achievement in allowable areas in the work that they are currently doing for the school as well as an assurance that work was not an ordinary job expectation for the person being paid and that the work was voluntary and done during a time when that person is not compensated by the school.

6.10. **Four Criterion for Title Program Request Approval:**

- 6.10.1.1. Completeness (The MPS Non-public School Title Program Request form must be submitted with requests for each vendor. All information needed to process the request must be included.)
- 6.10.1.2. Allowability under the relevant Title program and
- 6.10.1.3. Funding availability
- 6.10.1.4. Timeliness (Schools must submit requests and required documentation within time periods specified by MPS. Questions about requests for goods or services should be submitted by requesting schools during the fiscal year when those goods or services are requested.)

6.11. **Responsibility for non-approved expenditures:** Non-public schools are responsible for payment for items that are not approved for Title program expenditures for any reason.

6.12. **Responsibility for spending beyond amounts allocated:** Spending beyond allocated amounts is prohibited. In extenuating circumstances, if the processing of Title Program requests causes MPS to spend beyond the limit of the requesting school’s Title program allocation, the requesting school must reimburse MPS in the amount overspent. Carryover is not allowed.

6.13. **Discrepancies in requested and actual costs:** When the Title Program request forms seek expenditures that are different from actual amounts to be reimbursed; MPS will pay the smaller amount.

6.14. **Materials to be purchased with Title funds:** Materials will be ordered directly by the district through a purchase order with very few exceptions. Some vendors may not be willing or able to accept a purchase order. Non-public schools should confirm that a requested vendor will be

willing and able to process an MPS purchase order before making a Title program request for the use of that vendor. MPS will not order through many online providers.

- 6.15. **When orders for materials are submitted by non-public schools,** MPS must approve the related Title program request and MPS must be presented with an invoice for the approved items. To avoid delays in processing, such invoices should include:
  - 6.15.1.1. Provider contact information and tax ID number
  - 6.15.1.2. A brief description of items provided (including dates and names where appropriate)
  - 6.15.1.3. A reference to the non-public school that has requested the goods or services, and
  - 6.15.1.4. An invoice number.
- 6.16. **Ownership of Materials:** Materials purchased with Title program funds remain the property of MPS. Title program materials purchased under Titles IA to IV must be labeled “Property of MPS Title Programs” and an inventory of such materials must be kept available for review by participating non-public schools.
- 6.17. **Minimum Orders:** Orders under a single request for a single provider must exceed \$50, though reimbursements to individuals for approved expenses may be provided for smaller amounts when accompanied by required requests and documentation.
- 6.18. **Reimbursements and Direct Payments to Third Parties:** Requests for payments for services or reimbursements for approved activities or purchases will not be processed without required documentation (and such reimbursement may never be made to non-public schools or their sponsoring agencies). Beginning in the 2006-2007 school year, MPS will not prepay for professional development expenses (with the exception of memberships and subscriptions). MPS may never use Title funds to reimburse a non-public school directly, even for expenditures that might otherwise qualify for Title program payments. Documentation required for reimbursement might include:
  - 6.18.1.1. Invoices (see above) or statements.
  - 6.18.1.2. Receipts or other proofs of payment that clearly tie the good or service purchased to the payment made by the person seeking reimbursement (Credit card statements or canceled checks or vendor statements showing balances paid for the item in question would suffice, but copies of uncanceled checks or check register pages do not constitute a proof of payment.)
  - 6.18.1.3. Course descriptions and an explanation of how courses will help promote academic achievement for students of individual taking course.
  - 6.18.1.4. A statement from a course provider that indicates course taken, cost of course and amount paid by student. Reimbursements may not be made for courses paid for through subsidized student loans.
  - 6.18.1.5. Copy of registration, subscription or membership forms that have been submitted to providers by school making the request.

- 6.18.1.6. Written answers to questions regarding nature of proposed activities
  - 6.18.1.7. Names and role (teacher, aide, principal, for example) of persons for whom goods or services were purchased, as well as dates services were rendered and a brief description of the activity and how it may be justified as a Title program expense.
  - 6.18.1.8. Social security numbers of persons for whom stipends are being requested for work done during times when non-public school personnel are not being compensated by their school.
  - 6.18.1.9. Proof of participation in an approved professional development activity (This might include a report card, certificate of completion, or an “official” written confirmation from the provider (not a handwritten note).)
- 6.19. **Local Non-public School Title Program Facilitators:** Participating schools should consider designating staff members as local Title program facilitators. Title program funds may not be used to compensate non-public school personnel who serve in this capacity. A facilitator might be expected to:
- 6.19.1.1. Convene parents and staff members to consider uses of Title funds
  - 6.19.1.2. Gather documentation/information needed to provide MPS with information needed to consider Title program requests
  - 6.19.1.3. Submit and track Title program requests
  - 6.19.1.4. Receive label and inventory Title program materials
  - 6.19.1.5. Attend Title program consultation meetings
  - 6.19.1.6. Attend Title program trainings and workshops
  - 6.19.1.7. Keep track of Title program expenditures
  - 6.19.1.8. Respond to Title program requests for information (such as the Annual Title Program Participation Verification Survey)
  - 6.19.1.9. Communicate with local school community about the role and use of Title funds
  - 6.19.1.10. Work with MPS personnel on Title program related issues

## 7. Professional Development

### 7.1. Title funds may be used to supplement professional development that:

- 7.1.1. Promotes student centered goals of Title in question and not the goals of the non-public school itself. The table below provides information related to the PD requirements of various ESEA Title programs.

- 7.1.1.1. Under Title IA, professional development may only be provided for teachers and paraprofessionals (not administrators) that are currently working with students getting Title IA service or to the parents of those students. Title IA professional development must focus on the needs of Title IA students, not the general school population.
- 7.1.1.2. Under Title IIA, professional development must support student achievement in reading, math, language arts, social studies or science. Any non-public school teachers and administrators may participate as long as the professional development in question provides skill development to aid them in work they are currently doing with students. Parents are not eligible for professional development under Title IIA.
- 7.1.1.3. Under Title III, professional development must support the academic needs of students learning the English language. Teachers, administrators and parents of English language learners may participate.
- 7.1.1.4. Under Title IV, professional development must support an approved Title IV activity or program.
- 7.1.1.5. Is a part of a school professional development plan that reflects needs identified in a data driven assessment, and
- 7.1.1.6. Is the result of a decision making process that involves parents and staff members at participating schools.
- 7.1.1.7. Will be evaluated for effectiveness in order to guide decision making related to future professional development.
- 7.1.1.8. The chart below gives examples of Professional Development options. It also includes is a list of reasons why non-public schools have not had Professional Development approved under ESEA Title programs.

Milwaukee Title Program Professional Development Options for Non-public Schools				
	Title Ia	Title IIa	Title IID	Not allowed
Focus: student academic achievement	Must be focused on needs of teachers/aides and be designed to improve skills and knowledge to address needs of (at risk) Title Ia students.	In reading, math, language arts, social studies and science.	With emphasis on use of technology tools to promote learning.	Religious content or focus on school rather than teacher needs.
Eligibility	Non-public school teachers and aides currently working with students getting Title Ia service (not administrators)	Non-public school staff members.	Public and non-public school staff members.	Administrators providing PD within scope of their role may not be compensated.
Access	Decision making is responsibility of MPS and its Title Ia service providers in consultation with participating schools	MPS Title program requests form must be submitted along with any additional documentation that is required.	School staff members with undergraduate degrees apply and pay for university credits (Equitable participation provided through reservation of seats in courses for non-public participants.)	School requests must be approved based upon Title program guidelines. Schools are liable for payment for any non-authorized expenditures or commitments.
Purchases	Made by service provider, and must be appropriate and relevant to Title I objectives. Inventory and control of materials stays with service provider. <b>Materials are labeled "Property of MPS Title IA"</b> Only available for teachers and aides currently working with Title Ia students.	Non-consumable PD materials are to be labeled and inventoried by participating non-public schools. Materials may be used by non-public school staff members and parents.	Mini-grants may require consortiums to purchase materials. MPS retains control and ownership of non-consumable materials.	Consumables and supplies that are purchased and not used are to be turned over to MPS after PD event for which they are purchased.
Reimbursements	Individuals may be reimbursed by Title Ia service providers for allowable and pre-approved expenses.	Payments for approved expenditures by individuals may be reimbursed if Title program request is presented and approved with required documentation.	Individuals who complete courses with grade of A or B are eligible for tuition reimbursement. Stipends may be provided for mini-grant participation.	Non-public schools or affiliated agencies may never be reimbursed with Title funds, even if original purchase was for an allowable item. MPS must be reimbursed for expenditures that exceed school allocation amounts.

Milwaukee Title Program Professional Development Options for Non-public Schools				
	Title III	Title IV	Title V (not funded)	Not allowed
Focus: student academic achievement	Directed toward needs of English language learners.	Supports an approved Safe and Drug Free schools activity.	In any subject for which state standards exist.	Religious content or focus on school rather than teacher needs.
Eligibility	Staff members working with ELL students.	Staff members working on related approved Drug Free schools activity.	Non-public school staff members.	Administrators providing PD within scope of their role may not be compensated.
Access	MPS Title program requests form must be submitted along with any additional documentation that is required.	Approved by MPS Title IV office for schools that are accepted for Title IV participation.	MPS Title program requests form must be submitted along with any additional documentation that is required.	School requests must be approved based upon "Title program guidelines. Schools are liable for payment for any non-authorized expenditures or commitments.
Purchases	Non-consumable PD materials are to be labeled and inventoried by participating non-public schools. Materials may be used by non-public school staff members and parents.	Non-consumable PD materials are to be labeled and inventoried by participating non-public schools. Materials may be used by non-public school staff members and parents.	Non-consumable PD materials are to be labeled and inventoried by participating non-public schools. Materials may be used by non-public school staff members and parents.	Consumables and supplies that are purchased and not used are to be turned over to MPS after PD event for which they are purchased.
Reimbursements	Payments for approved expenditures may be reimbursed for individuals if Title program request is presented and approved with required documentation.	Payments for approved expenditures may be reimbursed through MPS Title IV office with required documentation.	Payments for approved expenditures may be authorized if Title program request is presented and approved with required documentation.	Non-public schools or affiliated agencies may never be reimbursed with Title funds, even if original purchase was for an allowable item. . MPS must be reimbursed for expenditures that exceed school allocation amounts.

7.2. **MPS requests for information about proposed professional development:** MPS may pose clarifying questions related to particular requests for professional development or other expenditures. Title program professional development must conform to guidelines suggested above. These questions only need to be answered at the request of MPS. See Appendix B to see examples of questions that might be asked.

7.3. **School discretion on spending under Titles IIA and III.** Local schools indicate the amount to be spent related to Title IA, IIA and III program request. (Titles use a standard of “reasonableness” of requests in determining if payments for a particular activity may be made.) Schools may decide to cover all or any part of expenses related to professional development activities of staff members and might

consider adopting policies and procedures that ensure decision making based upon school needs and equitable access to support within the school.

- 7.4. **Substitute Teachers:** Title program funds may not be used to pay for substitute teachers at non-public schools (even if the subs are hired to replace staff members who are participating in approved professional development activities).
- 7.5. **Allowable uses of Title funds for professional development:** Title program professional development funds may pay for:
  - 7.5.1. Tuition reimbursement for staff members for classes that address Title program goals.
    - 7.5.1.1. If request for Title program reimbursement is approved, payment will be made directly to person taking the approved course when grade and proof of payment are submitted to the non-public school Title program office. **Documentation for course work should clearly show that the institution sponsoring the work received payment for the course(s) in question from the person seeking the reimbursement. Proof of payment should be on “official” forms provided by the institution, not in the form of bank statements or canceled checks. Proof of completion (such as a report card) is also required.**
    - 7.5.1.2. MPS does not pay stipends for participation in courses offered for university credit.
    - 7.5.1.3. Title program funds may not be used to repay subsidized loans.
    - 7.5.1.4. MPS will not prepay tuition.
  - 7.5.2. Reasonable fees for professional development delivered by qualified third parties.
  - 7.5.3. Stipends for staff members participating in or providing professional development.
    - 7.5.3.1. Such stipends may only be paid for work done outside of time when staff members are compensated by local school and for work that is not a normal expectation for a person serving in their role in the school (if stipends are to be paid, requesting schools may not require attendance at the PD event in question, since meeting a requirement of an employer is a normal expectation for all employees.)
    - 7.5.3.2. Stipends may only be provided after the work being compensated has been done.
    - 7.5.3.3. Schools must submit personal information (legal name, social security #, home address, role in school) for staff members being compensated.
    - 7.5.3.4. Reasonable reimbursement rates may be determined by school making request.
    - 7.5.3.5. Schools requesting locally developed professional development activities should provide answers for the professional development questionnaire that is provided as a workbook in the Title program request form.
    - 7.5.3.6. MPS considers the provision of PD to be a part of the job of school administrators. MPS will not provide a stipend for a local school administrator for the provision of PD even if the PD takes place outside of work hours.

- 7.5.3.7. Stipends may be provided for participating in approved PD, but not for doing the ordinary work of the school. Schools may, for example, decide to seek PD on the use of reading inventories, or on ways to conduct an academically focused school needs assessment or on learning how to do curricular alignment with academic standards. Stipends for the work done in the PD sessions would be allowable, but the actual use of the reading inventory with students or the time spent conducting a needs assessment or aligning curriculum with standards would be considered the work of the school, and not eligible for ESEA funded stipends.
- 7.5.4. Stipends for experienced (non-administrative) staff members who serve as mentors for new teachers during hours when they are not compensated by the local school.
  - 7.5.4.1. Requests for such stipends should be accompanied by a statement from a local school administrator confirming number of reimbursable hours along with a description of mentoring activities.
- 7.5.5. In some cases, a school requests multiple payments to staff members for participating in the same professional development activity. In past years, MPS would send such payments to the school address. Beginning in the 08-09 school year, MPS will require home address information to pay stipends.
- 7.5.6. Professional development resource materials
  - 7.5.6.1. Books, tapes, software or kits on topics designed to support professional learning goals.
  - 7.5.6.2. If such materials are purchased under Title IA, they remain in the inventory and control of Title IA, though they may be lent to non-public schools for use by staff members currently working with Title IA enrolled students.
- 7.5.7. Reasonable expenses for food and materials related to a professional development activity.
  - 7.5.7.1. For example, note paper and written materials can be provided to support an activity, but a banner promoting the event, but not contributing to the content would not be allowed.
  - 7.5.7.2. Secondary expenses such as food and lodging are allowed, but they should not be the focus of a professional development event. MPS may refuse to honor requests for extraordinary PD related expenses at its discretion.
  - 7.5.7.3. Materials not consumed in the course of Title funded professional development are the property of MPS. If reusable materials such as display boards and flip charts are purchased for a professional development activity under Title IIA, they would need to be turned over to the district after the event and not put to general use in the school.
- 7.5.8. Conferences, conventions, workshops and related expenses.
  - 7.5.8.1. Research related to effective professional development indicates that participation in such events will not be an effective use of professional development funds unless the information available at the event is closely tied to ongoing school based improvement

initiatives. Schools must justify participation in such events based upon identified school needs and plans for professional development.

- 7.5.8.2. Such events may entail payments for registration, travel, accommodations and a per diem for local travel and meals. MPS will not prepay any of these expenses. *Separate Title program requests are required for each entity to be paid.*
- 7.5.8.3. Travel, accommodation and registration arrangements are to be made by conference attendees, who should make certain that expenditures can be documented and understand that reimbursements are subject to approval in the request process.
- 7.5.8.4. Travel and accommodations may also be provided speakers brought to Milwaukee for approved professional development activities. (Such expenses are most easily covered in the invoice supplied by the service provider rather than as separately documented items.)
- 7.5.8.5. Allowable per diem reimbursements vary from city to city and are updated periodically. Recent per diem and car travel information is posted on the Milwaukee non-public school web site. Receipts for meals and local travel related to out-of-town trips must be presented for per diem reimbursements. Payments will be made to limit of allowable per diem or allowable receipt total, whichever is less. When requests have been made for multiple attendees, a separate request and separate receipts should be submitted for each. A worksheet for tracking and organizing conference related documentation is also available at the MPS non-public school web site. Per diems are for food and local travel. Entertainment and alcoholic beverages are not reimbursable.
- 7.5.8.6. Car Travel/Mileage reimbursement (for travel from Milwaukee to destination city and back) may be requested for out of town conferences and conventions. Allowable amounts are predetermined and updated periodically on the MPS non-public school web site. Mileage reimbursements cover all car travel related costs (tolls, parking, and gas, for example). Receipts related to these travel expenses are not required, but proof of participation in an approved professional development activity at the destination city is required. One car travel reimbursement per vehicle is allowed.
- 7.5.8.7. Car rentals are not reimbursable unless an activity is located at a place where other means of transportation are needed, but not available.
- 7.5.8.8. Individuals who pay expenses related to an approved professional development activity may be reimbursed directly upon the submission of proofs of payment and participation in an approved professional development activity. Such documentation should be submitted promptly upon the completion of an event. Documentation must clearly show that payments were made for related approved professional development activities by the person for whom the reimbursement is sought. A travel request worksheet is available with other Title program request documents on the MPS non-public school web site. When travelers submit duplicate receipts (for the entire amount paid, not for individual portions of a shared receipt), the district will disallow both payments.
- 7.5.8.9. MPS will not pay for overnight stays for “staff retreats” for professional development
- 7.5.8.10. MPS will not pay to send entire staffs or large portions of staffs to out of town

conferences or conventions. One or a few staff members (such as grade level representatives) may attend out of town events and report back to peers upon return.

7.5.8.11. MPS will not approve travel outside of the 48 contiguous US states for PD, though exceptions may rarely be made for uniquely available content in surrounding states and nations.

7.5.9. Subscriptions (when subscriptions are for professional materials that will support Title program goals)

7.5.9.1. Schools should submit Title program requests for payment for professional periodicals along with copies of completed subscription applications for the items requested. Upon MPS approval of a Title program expenditure, they must submit the application to the provider and MPS will send payment. Invoices for subscriptions may be sent directly to the non-public school Title program office and should contain information about the school ordering the subscription.

7.5.10. Memberships (when memberships in professional organizations supports Title program goals, by providing, for example, professional periodicals or access to conferences or conventions that support Title program goals). Such memberships may be purchased for individuals, but not for participating schools themselves.

7.5.10.1. Follow procedures described for subscriptions above.

7.5.11. Non-public schools may take advantage of professional development offered by MPS personnel. Pricing and arrangements for such activities can be made directly with MPS departments offering such support. Payments from Title funds may be made through budget transfers. A list of contacts for district resources is available on the MPS non-public school web site. MPS also posts a professional development calendar on its web site. A link to this calendar may be found on the non-public page.

## **8. Title Specific Information Related to Professional Development**

8.1. Title IA professional development in Milwaukee is provided through the MPS's third party providers: Catapult Learning, Nonpublic Educational Services, Inc. (NESI) and Learning Exchange.

8.1.1. A portion of Title IA allocations must go to support professional development.

8.1.2. Title IA participants work with their service provider to develop professional development activities to support the academic achievement of students who are currently getting Title IA services.

8.1.3. Under Title IA, professional development must focus on the needs of Title IA students.

8.1.4. Only teachers and aids who are currently working with Title IA students may participate in Title IA funded professional development. (Administrators are not eligible to participate in Title IA professional development unless they are also full time classroom teachers who are currently working with Title IA students)

8.1.5. While Title IA service providers may propose a "menu" of professional development activities,

schools may work with their provider to develop professional development plans that go off of the “menu”. Title IA professional development should be planned in close consultation with Title IA service providers. (Schools should not expect that Title IA funds will be available for any professional development they may have arranged without consultation with their provider. Title IA professional development must be arranged through the Title IA service provider.)

- 8.1.6. MPS Title IA personnel are available to consult with schools and service providers on professional development issues.
- 8.1.7. Title IA does not allow any religious content to be a part of Title IA professional development and requires that all professional development focus on the needs of Title IA students. (Courses, workshops or conferences with general interest content may not ordinarily be attended with Title IA funds. Exceptions may be granted to address individual needs at a particular school, but those exceptions would be rare and subject to approval and documentation by MPS, through its Title IA service providers.)
- 8.2. Title IIA is designed to support professional development to promote student academic achievement in the “core subject areas” of reading, language arts, math, social studies and science. Milwaukee non-public schools get an allocation amount that is based upon a consultation-developed formula that considers both school size and school need. Schools determine how Title IIA money will be expended and submit Title program requests to MPS. Requests are reviewed by MPS and expended per non-public school directives if they meet title program guidelines, do not exceed allocation limits and are accompanied by appropriate documentation.
- 8.3. Title IID offers professional development that does not provide dollar amount allocations for non-public participants. This Title funds selected graduate level professional development courses and other programs for individuals who have at least a bachelor’s degree. A number of seats are reserved for non-public participants in each course or activity based upon non-public school equitable participation guidelines. Schools that requested Title IID participation will get information about course offerings and procedures for participation directly from MPS. Call 438-3677 is the MPS contact person for Title IID activities.
- 8.4. Title III professional development must address the academic achievement needs of the English Language Learning population of the non-public school.
- 8.5. Title IV mandates the use of research proven interventions to promote safe and drug free schools. Professional development in support of an approved program is allowed.
- 8.6. Title V funds are designed to meet a variety of non-public school needs, including professional development needs in any subject area for which there are state standards. Areas not covered under Title IIA, such as music, art, physical education and foreign languages are allowed under Title V. Since Title V funding was not provided after the 2007-2008 school year, these unique areas are not currently covered with ESEA funds.
- 8.7. Funds from multiple Titles may be combined to support professional development activities, but when funds are spent this way, the activities must be allowed under every Title used. (Schools may also pay for professional development using a combination of Title and non-Title money.)
- 8.8. Title funds are intended to supplement and not supplant the work of schools. Schools should also support an array of professional development activities from non-Title sources.

## 8.9. Professional development not allowed under ESEA for non-public schools

8.9.1. **Religious Content** - Title funds can not support religious content.

8.9.2. **Supplement not Supplant** - Title funds are designed to support students attending non-public schools, not the schools themselves. Professional development under any Title must focus on academic achievement per the goals of the Title. Professional development that is focused on broader school needs is not allowed. Topics that would not be allowed might include fund raising, board development, recruiting, or school accreditation. In some cases, PD may be provided to give staff members the tools that they will need to address activities designed to address student achievement needs (Examples: How to Conduct a Needs Assessment, How to do Curriculum Alignment or Mapping or How to do a Reading Inventory.) In such cases, the PD itself might be supported with Title IIa funds, but the actual work involved in conducting a school needs assessment, doing curriculum alignment or mapping or performing reading inventories would be considered “the work of the school,” and not eligible as an ESEA supported activity.

8.9.3. **Payments to Non-public schools not allowed** – Title funds may not be disbursed directly to non-public schools for any reason. This includes reimbursements for professional development goods and services that have been purchased by participating non-public schools.

8.9.4. **Payments to administrators who are engaged in duties normally considered to be a part of their jobs** – MPS considers the provision of professional development support as a part of the job of school administrators, even if done outside of the normal work day or school year. While school administrators may be reimbursed for participating in PD under some ESEA Title programs, they may not be compensated for providing PD to their own staff members.

8.9.5. **PD involving travel outside of the contiguous 48 states** – Travel outside of Mexico, Canada and the United States will not be allowed. Travel to other states or nearby nations will be considered on a case by case basis and will only be approved only when similar PD content is not offered within the 48 states.

8.9.6. **Content too indirectly related with research based PD designed to promote student achievement.** – Improving student achievement is the goal of ESEA professional development. MPS will not approve activities that do not have a primary focus on research based promotion of student achievement.

8.9.7. **Professional Development expenses not reasonably justified by content to be gained** – MPS will make judgments about the reasonableness of particular professional development activities and reserves the right to deny or require changes in plans. Examples of PD related requests that might be denied or questioned as unreasonable: travel and or overnight stays at conferences for an entire school staff; extended PD “retreats” for entire staffs at nearby resorts; payment for a school banquet justified by content to be gained from an after dinner speaker.

8.9.8. **Professional Development more focused on core needs of school than upon promotion of student achievement** – PD on topics such as legal issues, financial accountability or teacher evaluation may not be supported with ESEA funds in private schools. Work to be compensated with stipends must also be focused on the promotion of student achievement, not on the core work of the schools. Teachers may be compensated for “learning about” such things as curricular

mapping or needs assessment, but the actual work of creating the schools curriculum or doing the needs assessment would not be considered allowable professional development.

9. **Combining Funds:** Funds from a combination of Titles may be used to support non-public school expenditures as long as the expenditure in question is allowable under each of the Title programs funding it. Schools may also combine Title funds with local funds to cover some expenditures as long as the expenditure in question does not serve to use Title funds to “supplant” local school responsibilities.

#### 10. **Required Topics for Title IA Consultation Addressed :**

10.1. **Identification of the needs of Title I eligible private school children.** Participating non-public schools provide eligibility lists and Title I need rankings based upon multiple criterion. The actual number of eligible students in greatest need to be served is determined in consultation with individual non-public schools by consideration of; capacity of the program model, levels of service delivered to students, and the limitations related to “targeted assistance” to Title I students at non-public schools. Third party vendors or MPS personnel do intake diagnostic screening in identified academic areas of greatest need. Vendors and ultimately, MPS retain final authority over decisions about students to be served.

10.2. **Services MPS will offer to eligible private school children.** MPS teachers or Title IA vendors will offer enrolled students at least 120 minutes in each subject area addressed. Instruction will take place in multiple small group sessions per five day school week in areas of greatest academic need.

10.3. **How and when MPS will make decisions about the delivery of services.** MPS will review delivery of services decisions each year in ongoing consultation with participating non-public schools. Once service model decisions have been reached, participating non-public schools will have an opportunity to select from among available options for Title I service. Once a Title IA service provider is selected by or for a non-public school, that school will not have the opportunity to change service providers until the next annual service provider selection period.

10.4. **How, where and by whom MPS will provide services to eligible private school children, including a thorough consideration and analysis of the views of the private school officials on the provision of Title I services through a contract with a third-party provider.**

10.4.1. Title I services will generally be delivered in small group instructional settings in an area designated for Title I use at participating non-public schools. Schools may elect to send some or all of their Title I students to another site for instruction.

10.4.2. Services may also include, but are not limited to:

- Extended-day Services (before or after-school, summer or weekend programs);
- Family Literacy Programs;
- Counseling Programs (which may be used to supplement Title I educational services);
- Computer-Assisted Instruction (CAI), which may be used as central focus or as a supplement to other
- services;
- Home Tutoring;
- Take-Home Computers;
- School Day Services designed to address individual learning needs;
- Combinations of the above; and

- Other programs allowable for non-public schools under Title Program regulations.

10.4.3. Title I service providers will include The Learning Exchange; Catapult Learning); Nonpublic Educational Services Inc. or Milwaukee Public School teachers. The third party service provider model was adopted in consultation with non-public schools during the spring of 2003. Service providers were chosen in an MPS “Request for Proposals” (RFP) process that included non-public school parents and staff members in the evaluation and selection of proposals. MPS renews the RFP process every three years. Only service providers identified in the RFP process may be used as third party providers, though those identified may subcontract with others to meet contract requirements (Title I service providers are required to subcontract with historically underutilized minority and female headed businesses with a portion of their contract amounts.)

10.5. **How MPS will assess academically the Title I services to eligible private school children in accordance with §200.10 and how MPS will use the results of that assessment to improve Title I services.** Title IA students will be assessed at the beginning and end of each academic year. Standardized tests will be administered by Title I personnel with expenses related to testing coming from Title IA administration funds, not non-public school allocations. An analysis of test data will focus on progress made by students who have been receiving Title I services for six weeks or more. Improvement plans will be developed for individual schools and service models when data suggests that adequate progress has not been made. Participating non-public schools may consult with MPS about the possibility of using alternative assessments to more closely reflect the academic achievement standards of the non-public school.

10.6. **The size and scope of the equitable services that MPS will provide to eligible private school children and, consistent with §200.64, the proportion of funds that will be allocated to provide these services.** Annual Participation Surveys will gather data on number and concentration of students under the age of 18 in grades K5 to 12 from low income families who reside in the City of Milwaukee and attend participating non-public schools. MPS will follow federal guidelines relating to allowable deductions from that year’s Title I grant, then the percentage of Title I funds earmarked for City of Milwaukee students to be set aside for participating non-public school students will reflect their percentage of all students from low income families in participating schools. Individual school allocations will be determined by a formula that considers both the number of students from low income families enrolled in a school and the concentration of such students in that school (the higher the concentration, the higher that school’s per pupil allocation).

10.7. **The method or sources of data that MPS will use under §200.78 to determine the number of private school children from low income families residing in participating public school attendance areas, including whether MPS will extrapolate data, if a survey is used.** MPS will collect income data from individual participating non-public schools. MPS will not extrapolate data. Students from families who meet income guidelines that would qualify them for federal free and reduced lunch will be considered low income students. Other Milwaukee programs that use the same or lower income criterion may also be used, though each student may only be counted once. If no such programs exist in a non-public school (or if the income guidelines for current programs are increased to a point beyond limitations of the lunch program), then a family survey may be conducted to provide income data.

10.8. **The equitable services MPS will provide to teachers and families of participating private school children.** Each year, MPS will determine district Title IA funding levels for parental involvement and professional development, then set aside funds based upon those amounts and equitable participation guidelines for participating non-public schools.

## Appendix A:

### Milwaukee Public and Non-public School Title IA Allocation Formula: An Example

The Title IA School Allocation formula for Instruction is based on a formula by multiplying the (Milw. Residents Total Enroll. K5-17) x (Milw. Residents % F/R K5-17) x (per pupil amt).

An example formula of Title IA Allocation would be: Assuming 4 schools each have 100 students and having F/R lunch percentages that vary by 25% from 25 to 100% and a \$125,000.00 total allocation for Title IA instruction. Each school's per pupil allocation is found by dividing the school's allocation by number of F/R students. Title IA Instructional allocation is a formula of the eligible enrollment and the free and reduced lunch percentage.

Instruction				
	Column B	Column C	Column D	Column E
School	Milw. Residents Total Enrollment K5-17	Milw. Residents % Free/Reduced K5-17	Total School Title IA Allocation for Instruction	School's Per Pupil Allocation
1	100	100%	\$50,000.00	\$500.00
2	100	75%	\$37,500.00	\$375.00
3	100	50%	\$25,000.00	\$250.00
4	100	25%	\$12,500.00	\$125.00
		Total allocated:	\$125,000.00	
		Total available:	\$125,000.00	
Allocation (per pupil amount based on 100% F/R lunch eligible):			\$500.00	

Set aside for non-public schools is determined by percentage of City of Milwaukee resident F/R lunch eligible students being served by participating non-public schools, e.g. if 85000 F/R lunch students were being served by public schools and 15000 F/R students were being served by participating non-public schools, then 15% of funds available to MPS for Title IA eligible City of Milwaukee students would be set aside for provision of instructional services to eligible students attending non-public schools (after allowable administrative expenses were subtracted from total city allocation).

MPS provides the current equitable participation percentages to funds allocated by the district for Title IA professional development and parental involvement and uses the same formula to determine school shares of available funds. Finally, funds for allowable program administration are added to individual school allocations.

Final allocation amounts depend upon total amount available to City of Milwaukee students (released by Wisconsin Department of Public Instruction) and actual F/R numbers and concentrations at participating public and non-public schools (determined by annual Non-public School Verification of Consultation Survey).

## Appendix B



### Non-public School Title Program Request Reply

#### Return Information:

A Microsoft Word version of this form is available at

[http://www2.milwaukee.k12.wi.us/title\\_i/Web\\_Pages/non-public.html](http://www2.milwaukee.k12.wi.us/title_i/Web_Pages/non-public.html)

**Please return answers promptly to MPS, attn: Title I Non-public, Room 253, #11 via:**

**E-mail attachment** (preferred method: e-mail reply will confirm receipt) to:  
requests@lists.milwaukee.k12.wi.us

**Hand delivery** to 5225 W. Viet St. (Milwaukee 53208)

**FAX** to (414) 475-8548; or

**Mail** to P.O. Box 2181; Milwaukee, WI 53201

Call (414) 475-8122 or (414) 475-8892 with questions.

Date:

To:

Re:

The district needs more information in order to process your Title Program Request. Please answer the following questions related to your Title Program request for professional development activities:

- 1) Can school provide assurances that content of presentations will be strictly secular?
  - a) If presentations are not strictly secular, what percentage of presenter time will be used to address Title Program goals with strictly secular content?
- 2) If requests for lodging and travel are associated with this professional development request, are those expenses solely related to the planned professional development, or are presenters providing other services to the school that are unrelated to Title Program goals?
  - a) If no, what percentage of compensated presenter time will be used to address Title Program related goals?
- 3) What are the contents of the workshop?
- 4) How does this topic fit into the school professional development plan and relate to identified professional development needs for the school?
- 5) How will this activity address academic achievement needs in core academic achievement areas?

- 6) Who will the audience be?
- 7) How many participants will there be?
- 8) What are the qualifications and relevant experience of the presenters?
- 9) How will the workshops be evaluated?
- 10) Are the professional development presenters employed by or associated with the requesting non-public school?
  - a) If yes, what is the relationship?
  - b) If yes, will the presenter be compensated with Title funds only for services delivered when they are not being compensated by any other entity for their work?
- 11) If stipends are being requested by non-public school employees participating in the professional development activity, are they being compensated with Title funds only for services delivered when they are not being compensated by any other entity for their work?
- 12) Were local school parents and staff members involved in decision making related to the proposed professional development, and will they be involved in the evaluation?

▪ Appendix C

**Note: Section 901 of Title IX provides a definition of allowable Professional Development for public school participants. Some activities described here (Section (34)(A)(vi) in bold and italics below, for example, are not allowed for non-public school participants because of limitations on the use of Title funds for non-public participants. Most of the provisions do apply to non-public school participants.**

**Professional Development Definition – from TITLE IX—GENERAL PROVISIONS**

SEC. 901. GENERAL PROVISIONS of ESEA – Section 9101

“(34) PROFESSIONAL DEVELOPMENT.—The term ‘professional development’—

“(A) includes activities that—

“(i) improve and increase teachers’ knowledge of the academic subjects the teachers teach, and enable teachers to become highly qualified;

“(ii) are an integral part of broad schoolwide and districtwide educational improvement plans;

“(iii) give teachers, principals, and administrators the knowledge and skills to provide students with the opportunity to meet challenging State academic content standards and student academic achievement standards;

“(iv) improve classroom management skills;

“(v) (I) are high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher’s performance in the classroom; and

“(II) are not 1-day or short-term workshops or conferences;

“(vi) ***support the recruiting, hiring, and training of highly qualified teachers, including teachers who became highly qualified through State and local alternative routes to certification;***

“(vii) advance teacher understanding of effective instructional strategies that are—

“(I) based on scientifically based research (except that this subclause shall not apply to activities carried out under part D of title II); and

“(II) strategies for improving student academic achievement or substantially increasing the knowledge and teaching skills of teachers; and

“(viii) are aligned with and directly related to—

“(I) State academic content standards, student academic achievement standards, and assessments; and

“(II) the curricula and programs tied to the standards described in subclause (I) except that this subclause shall not apply to activities described in clauses (ii) and (iii) of section 2123(3)(B);

“(ix) are developed with extensive participation of teachers, principals, parents, and administrators of schools to be served under this Act;

“(x) are designed to give teachers of limited English proficient children, and other teachers and instructional staff, the knowledge and skills to provide instruction and appropriate language and academic support services to those children, including the appropriate use of curricula and assessments;

“(xi) to the extent appropriate, provide training for teachers and principals in the use of technology so that technology and technology applications are effectively used in the classroom to improve teaching and learning in the curricula and core academic subjects in which the teachers teach;

“(xii) as a whole, are regularly evaluated for their impact on increased teacher effectiveness and improved student academic achievement, with the findings of the evaluations used to improve the quality of professional development;

“(xiii) provide instruction in methods of teaching children with special needs;

“(xiv) include instruction in the use of data and assessments to inform and instruct classroom practice; and

“(xv) include instruction in ways that teachers, principals, pupil services personnel, and school administrators may work more effectively with parents; and“(B) may include activities that—

“(i) involve the forming of partnerships with institutions of higher education to establish school based teacher training programs that provide prospective teachers and beginning teachers with an opportunity to work under the guidance of experienced teachers and college faculty;

“(ii) create programs to enable paraprofessionals (assisting teachers employed by a local educational agency receiving assistance under part A of title I) to obtain the education necessary for those paraprofessionals to become certified and licensed teachers; and

“(iii) provide follow-up training to teachers who have participated in activities described in subparagraph (A) or another clause of this subparagraph that are designed to ensure that the knowledge and skills learned by the teachers are implemented in the classroom. “(35) PUBLIC

▪ **Appendix D**

**“PART E—UNIFORM PROVISIONS “Subpart 1—Private Schools “SEC. 9501. PARTICIPATION BY PRIVATE SCHOOL CHILDREN AND TEACHERS.”(a) PRIVATE SCHOOL PARTICIPATION.—**

“(1) IN GENERAL.—Except as otherwise provided in this Act, to the extent consistent with the number of eligible children in areas served by a State educational agency, local educational agency, educational service agency, consortium of those agencies, or another entity receiving financial assistance under a program specified in subsection (b), who are enrolled in private elementary schools and secondary schools in areas served by such agency, consortium, or entity, the agency, consortium, or entity shall, after timely and meaningful consultation with appropriate private school officials provide to those children and their teachers or other educational personnel, on an equitable basis, special educational services or other benefits that address their needs under the program.

“(2) SECULAR, NEUTRAL, AND NONIDEOLOGICAL SERVICES OR BENEFITS.—Educational services or other benefits, including materials and equipment, provided under this section, shall be secular, neutral, and nonideological.

“(3) SPECIAL RULE.—Educational services and other benefits provided under this section for private school children, teachers, and other educational personnel shall be equitable in comparison to services and other benefits for public school children, teachers, and other educational personnel participating in the program and shall be provided in a timely manner.

“(4) EXPENDITURES.—Expenditures for educational services and other benefits provided under this section for eligible private school children, their teachers, and other educational personnel serving those children shall be equal, taking into account the number and educational needs of the children to be served, to the expenditures for participating public school children.

“(5) PROVISION OF SERVICES.—An agency, consortium, or entity described in subsection (a)(1) of this section may provide those services directly or through contracts with public and private agencies, organizations, and institutions.

“(b) APPLICABILITY.—

(1) IN GENERAL.—This section applies to programs under—

“(A) subparts 1 and 3 of part B of title I;

“(B) part C of title I;

“(C) part A of title II, to the extent provided in paragraph(3);20 USC 7881.Federal Register, publication.

“(D) part B of title II;

“(E) part D of title II;

“(F) part A of title III;

“(G) part A of title IV; and

“(H) part B of title IV.

“(2) DEFINITION.—For the purpose of this section, the term ‘eligible children’ means children eligible for services under a program described in paragraph (1).

“(3) APPLICATION.—

(A) Except as provided in subparagraph

(B), this subpart, including subsection (a) (4), applies to funds awarded to a local educational agency under part A of title II only to the extent that the local educational agency uses funds under that part to provide professional development to teachers and others. “(B) Subject to subparagraph (A), the share of the local educational agency’s subgrant under part A of title II that is used for professional development and subject to a determination of equitable expenditures under subsection (a)(4) shall not be less than the aggregate share of that agency’s awards that were used for professional development for fiscal year 2001 under section 2203(1)(B) (as such section was in effect on the day preceding the date of enactment of the No Child Left Behind Act of 2001) and section 306 of the Department of Education Appropriations Act, 2001.

“(c) CONSULTATION.—

“(1) IN GENERAL.—To ensure timely and meaningful consultation, a State educational agency, local educational agency, educational service agency, consortium of those agencies, or entity shall consult with appropriate private school officials during the design and development of the programs under this Act, on issues such as—

“(A) how the children’s needs will be identified;

“(B) what services will be offered;

“(C) how, where, and by whom the services will be provided;

“(D) how the services will be assessed and how the results of the assessment will be used to improve those services;

“(E) the size and scope of the equitable services to be provided to the eligible private school children, teachers, and other educational personnel and the amount of funds available for those services; and

“(F) how and when the agency, consortium, or entity will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the private school officials on the provision of contract services through potential third-party providers.

“(2) DISAGREEMENT.—If the agency, consortium, or entity disagrees with the views of the private school officials on the provision of services through a contract, the agency, consortium, or entity shall provide to the private school officials a written explanation of the reasons why the local educational agency has chosen not to use a contractor.

“(3) TIMING.—The consultation required by paragraph (1) shall occur before the agency, consortium, or entity makes any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs under this Act, and shall continue throughout the implementation and assessment of activities under this section.

“(4) DISCUSSION REQUIRED.—The consultation required by paragraph (1) shall include a discussion of service delivery mechanisms that the agency, consortium, or entity could use to provide equitable services to eligible private school children, teachers, administrators, and other staff.

Milwaukee Public Schools Title Programs for Non-public Schools

5225 W. Vliet St.; Room 253, Office 11

Milwaukee, WI 53208

Phone: (414) 475-8122 or (414) 475-8892;

Fax: (414) 475-8548

[http://www2.milwaukee.k12.wi.us/title\\_i/Web\\_Pages/non-public.html](http://www2.milwaukee.k12.wi.us/title_i/Web_Pages/non-public.html)

