

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

Non-public School Title Program Handbook:

A participant's guide



Draft: September 2004

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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 Participation Verification Survey:** Non-public schools must indicate interest in participating in each Title program at the time of the Annual Milwaukee Public Schools Private School Participation Verification Survey. In Milwaukee, the survey period is generally in March (Annual survey dates are affected by school year calendars and dates of spring break.) 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 generally 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

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. Two steps are required to join the listserv:

1) Compose and e-mail to listserv@mail.milwaukee.k12.wi.us

2) 2) In the body of the e-mail, type: subscribe non-public (Typing anything else in the body of the e-mail may cause the attempt to fail.)

For more information on the Listserv, see Appendix E.

2.4. **Enrollment Audit:** Initial Title program allocations are based upon your enrollment and poverty data from the previous year. MPS consultations with Milwaukee non-public schools addressed this topic during the spring of 2004. A third Friday of September audit was agreed upon to adjust the allocations of schools that experienced enrollment increases of over 15% (including any new schools) and enrollment decreases of over 15%. In the audit, Title I

service providers or MPS personnel collect actual fall enrollment data. As a part of this audit, schools are asked to share enrollment and attendance information along with lists of City of Milwaukee resident students and to provide other documentation needed to allow MPS to fulfill its responsibility as LEA overseeing equitable distribution of Title funds for Milwaukee resident students. See Appendix D for an example of the audit form.

- 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 consistent with the number of eligible children enrolled in private elementary and secondary schools in the LEA... 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 ...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 under Titles I, II, III, IV and V of the Title program of Milwaukee is determined by how funds are set aside for Milwaukee non-public schools under each Title. Enrollment in non-public schools requesting participation in each Title program is compared with those enrolled in Milwaukee Public Schools. After any allowable deductions the percentage set aside for non-public schools matches the percentage of city residents that they serve.
- 2.5.2. **Under Title IA**, the same format for calculations is employed using numbers of students from low-income families only.
- 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.
- 2.5.4. **Under Title IID**, seats in selected graduate level courses are reserved for teachers from non-public schools based upon the percentage of Milwaukee resident students served at Title IID participating non-public schools.
- 2.6. **Separated, Secular and Non-ideological:** Title IA service providers are required to maintain the separate, secular and non-ideological nature of their instructional programs. As a result, "team teaching" instructional models with non-public school staff members are not allowed and religiously neutral instructional spaces are preferred. Title IA instruction is generally provided in a small group instructional setting. Research affirms the effectiveness of this model in promoting student achievement, even if students need to miss large group activities to participate.
- 2.7. **Supplementing and supplanting:** Title program funds are designed to supplement school programs to promote student achievement in reading, math, language arts, social studies and science. 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. Generally speaking, math manipulatives would supplement a math program. Math textbooks might supplant a schools responsibility to provide the basic text. Paying for Title IA student

assessments would generally supplement a school's 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 non-public school. 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.

- 2.8. **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 IX, 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." A link to the Uniform Provisions section of NCLB will be posted on the MPS non-public school web site along with this handbook.

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 City of Milwaukee resident 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."

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** (*emphasis and footnote added*) 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 I services may be provided on site at the private school, including religiously affiliated schools, or at other locations. Funds are generated on the basis of the number of children from low-income families who reside in participating public school attendance areas and attend private schools. Private school students who reside within a Title I 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 I students in professional development activities and of parents of Title I students in parent involvement activities.” The BPSST brochure goes on to point out that Title I is not governed by many of the “Uniform Provisions” that govern other Federal Title programs. Title IA has its own requirements.
- 4.1.1. **Third Party Title I 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 currently works with four service providers who were selected during a “Request for Proposals” (RFP) period that considered the offers of a number of educational service providers. Non-public school staff members and parents have served with MPS personnel in the RFP review process. Milwaukee non-public schools may only get Title IA service through MPS or one of the designated providers. Providers are selected periodically through the MPS RFP process. Providers contract with MPS to provide Title IA services. The most recent RFP for Title IA services to Milwaukee non-public schools and contract templates will be posted on the MPS non-public school Title program web site along with this handbook.
- 4.1.2. **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.
- 4.1.3. **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 it’s contracted service providers. Title IA materials may only be used by Title IA staff members and only with students who are enrolled in Title IA classes. Such materials remain the property of MPS. 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 IB, Reading First

4.2.1. **Purpose:** According to USED's BPSST pamphlet (page 4), "Reading First provides funding to implement comprehensive reading instruction for children in kindergarten through third grade. Funds must be used for reading programs; instructional materials; professional development; administering screening, diagnostic and classroom-based reading assessments; collecting and reporting data; and promoting reading and library programs. Reading First is governed by the Uniform Provisions, and private school children in the areas served by public schools receiving Reading First funds are eligible for services.

4.2.2. **Milwaukee Model:** In Milwaukee, Reading First funds were awarded in the spring of 2004 to two non-public schools under equitable participation guidelines. Reading First grants are not available annually.

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

4.3.1. **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."

4.3.2. **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.

4.4. Title IID, Enhancing Education Through Technology

4.4.1. **Purpose:** According to USED's BPSST pamphlet (page 11), "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."

4.4.2. **Milwaukee Model:** In Milwaukee, Title IID offers professional development opportunities for certified teachers at non-public schools. 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.

4.4.3. **Program Change Based Upon Consultation:** Beginning in 2004, information will be mailed each September to all Milwaukee nonpublic schools who indicated interest on the Title program Participation Verification Survey for that school year. The first round of courses will begin in October. Seats in courses will be held for non-public participants based upon equitable participation guidelines. Opportunities to collaborate with other Milwaukee schools in staff development provided by mini-grant funds will be available in November of 2004. Spring 2004 consultation led to the acceptance of this model to replace a model in which only staff members from selected non-public schools could participate.

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

4.5.1. **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 subgrant from the state are eligible to participate in this program.”

4.5.2. **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 LEP students in kindergarten to grade 3 and in the same language group; or 20 or more LEP students in grades 4 to 12 in the same language group. Schools that request Title III participation must work with MPS to provide information about their English Language Learners.

4.5.3. **Qualification for Title III Participation:** Limited funds are designated for schools that have concentrations of ELL students. Schools serving students in grades K5 to 5 must have at least 10 ELL students and schools serving students in Grades 6 to 12 must have at least 20 ELL students in order to qualify for funding. Title III funding for participating schools is based upon the number of such students in a school.

4.5.4. **Uses of Title III Funds:** Title III funds may be used for both materials and professional development that may be used 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.

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

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

4.5.7. **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.

4.6. Title IV, Safe and Drug-Free Schools and Communities:

- 4.6.1. **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."
- 4.6.2. **Milwaukee Model:** Milwaukee non-public schools may participate in research based, pre-approved Title IV activities that may be found in the Title IV section of the MPS non-public school Title program web site.
- 4.6.3. **Approved Title IV Activities:** Title IV provides funds for pre-approved, research-based programs that promote safe and drug free schools. Requests for activities not on the pre-approved lists will not be processed. Title IV approved activities and resources are posted on the MPS web site in the Title IV section. Information about nationally recognized, research based programs is available as a link to the U.S. Department of Health and Human Services Substance Abuse and Mental Health Services Administration Center for Substance Abuse Prevention (SAMHSA) web site at: http://modelprograms.samhsa.gov/template_cf.cfm?page=model_list. A document listing locally approved programs may also be downloaded.
- 4.6.4. **Waivers:** Schools that request Title IV expenditures not on the pre-approved lists must have proposed providers submit a written waiver request. A waiver form may be downloaded at the Title IV section of the non-public school web site. Waiver forms must be submitted to the MPS Title IV office at P.O. Box 2181; Milwaukee, WI 53201; Attn: Title IV, Room 265. Expenditures will not be made unless waiver requests are approved.
- 4.6.5. **Contact the MPS Title IV Office:** The MPS Title IV office may be contacted at 475-8057.
- 4.6.6. **Making a Title IV Request:** In the "Justify/Explain" portion of the MPS Title Program request form, schools should note that the request comes from one of the required lists or that a Title IV waiver form has been submitted and approved by the MPS Title IV office for the expenditure requested.
- 4.6.7. **Travel with Title IV Funds:** Limited Title IV funds are available to fund travel to support Title IV activities, such as pre-approved field trips.
- 4.6.8. **Special Requests:** While Title IV allows small expenditures to purchase materials designed to support an approved Title IV activity, any such requests must outline which pre-approved research based program is being supported by the expenditure and how the expenditure will support that program.

4.6.9. **Local School Planning for Title IV:** It is strongly suggested that non-public schools convene a committee of local stakeholders to assess local Title IV needs and to make decisions about Title IV initiatives at the school. MPS requires that each public school identify a Student Assistance Coordinator (SAC) to be the Title IV contact person. And Title IV committee liaison. Non-public schools may request that a stipend be paid to a staff member serving in this capacity at pre-approved events if that person is acting as SAC during time when they are not being compensated by the non-public school. Names and e-mail contact information for SACs may be submitted directly to the Title IV office so that they may be informed of Title IV events.

4.6.10. **Limits:** Title IV has a strict limit of \$1000 per day that may be spent on speakers or presenters being compensated related to approved Title IV activities.

4.7. Title V, Innovative Programs

4.7.1. **Purpose:** According to USED's BPSST pamphlet (page 13), "Innovative Programs support education reform and innovative school improvement programs to improve school, student and teacher performance. Private school students, teachers and other education personnel may receive professional development, library materials, educational equipment, and repair and minor remodeling or construction of public facilities. Other activities may include community service programs; consumer education; purchase of computer hardware and software; programs to hire and support school nurses; school-based mental health services; programs for cardiopulmonary resuscitation training in schools; and parent and community involvement."

4.7.2. **Milwaukee Model:** Non-public participants use Title Program request forms available at the MPS Non-public School Title Program Web Site to request expenditures up to allocation limits. MPS pays for approved services or orders approved materials that are then inventoried and labeled for appropriated use by non-public participants.

4.7.3. **Allowable expenses:** Title V funds may be used to order supplementary educational materials or to provide professional development to support student learning in core academic areas. Title V funds may generally not be used to buy materials to support non-academic areas such as physical education, art or music, nor to buy supplies such as pencils, writing paper, glue or crayons for students.

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 Titles IIA, IV and V

5.1.1. Allocations are awarded based upon both school enrollment and school need. Non-public school consultation led to the following formula to determine school need.

5.1.2. The number of students at each school from low-income families (as determined by federal free and reduced lunch guidelines or an equivalent measure) is added to the number of all students enrolled.

5.1.3. 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.)

- 5.1.4. The allocation enrollments of all participating non-public schools is totaled.
 - 5.1.5. 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.
 - 5.1.6. The per pupil amount is multiplied times the allocation enrollment of the school to determine allocations under each Title.
 - 5.2. **Under Title IA**, only students who come from low-income families (as determined by federal free and reduced lunch guidelines or an equivalent measure) at each school are counted to determine allocation amounts. Per pupil amounts vary depending upon the concentration of low-income students in the school. See Appendix A.
 - 5.3. **Under Title IB** (Reading First), two of twenty-two grants were set aside for non-public school participation based upon the percentage of Milwaukee resident students enrolled at non-public schools responding to a special Reading First Participation Verification Survey conducted in the fall of 2003.
 - 5.4. **Under Title IID**, seats in selected graduate level courses 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. After that, remaining seats are filled by applicants from non-public or public schools.
 - 5.5. **Under Title III**
 - 5.5.1. ELL students are ranked according to DPI guidelines, with students ranked #1 being those in most need.
 - 5.5.2. The total number of ELL students identified in levels 1 to 4 in non-public schools is then divided into the amount available under equitable participation guidelines to determine a per pupil amount.
 - 5.5.3. The number of ELL students at each school is then multiplied times the per pupil amount to determine individual school allocations.
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. These forms may be used to request expenditures under Titles IB (Reading First), IIA, III, IV and V. Extensive trainings in the appropriated use of these Microsoft Excel based forms are offered in the fall of the school year. The documents contain many resources, including “workbooks” that allow schools to track expenditures and keep Title program inventories. Non-public schools are very strongly encouraged to have the school representative responsible for processing Title program requests attend one of these sessions. (See Non-public School Title Program Calendar on the web page cited above for registration information.)
 - 6.2. **Reimbursements under Title IID** will be made through the MPS office sponsoring Title IID graduate level courses. For more information, contact Anne Knackert at 438-3677 or knackeaf@mail.milwaukee.k12.wi.us or visit this web page: http://www.milwaukee.k12.wi.us/pages/MPS/Teachers_Staff/Training/Continuing_Education/Technology/Online_Professional_Courses?PHPSESSID=336ca22d15090bf8602de3444eed6c6fb

- 6.3. **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 (1% or more to be spent for family involvement of students currently receiving Title IA service) and professional development (5% or more for staff members currently working with students getting Title IA educational services). 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, curricular decisions and much more. Final decisions on Title IA expenditures are left up to the provider and, ultimately, MPS after consideration of local school input.
- 6.4. **Control of Title Funds:** Title program funds may never be sent directly to non-public schools or their sponsoring agencies.
- 6.5. **Non-public School Use of Title Program Materials:** Materials purchased with Title Program must support student achievement in core academic areas (reading, math, language arts, social studies or science). Milwaukee non-public schools submit Title program requests under Titles IB, IIA, III, IV and V 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, 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.”

Within the restrictions noted above, non-public schools have free use of materials purchased under the Titles listed above. If Title program materials wear out or are no longer needed, 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 for a decision about their disposition.

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.

6.6. **Stipends** may be paid directly to non-public school staff members as reimbursements for approved expenditures (for tuition, for example) or as consideration for participation in professional development activities. Social security numbers of staff members must be submitted with requests for payments that are not reimbursements for expenses related to Title program requests.

6.7. **Three Criterion for Title Program Request Approval:**

6.7.1. 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.)

6.7.2. Allowability under the relevant Title program and

6.7.3. Funding availability

6.8. **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.

6.9. **Responsibility for spending beyond amounts allocated:** 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.

6.10. **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.

6.11. **Purchases of Materials to be purchased with Title funds:** Materials will be ordered directly by the district through a purchase order in most case. Some vendors may not be willing or able to accept a purchase order. Non-public schools may want to 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.

- 6.12. **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:
- 6.12.1. Provider contact information and tax ID number
 - 6.12.2. A brief description of items provided (including dates and names where appropriate)
 - 6.12.3. A reference to the non-public school that has requested the goods or services, and
 - 6.12.4. An invoice number.
- 6.13. **Ownership of Materials:** Materials purchased with Title program funds remain the property of MPS. Title program materials purchased under Titles IB to V 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.
- 6.14. **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.
- 6.15. **Reimbursements:** 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). Documentation might include:
- 6.15.1. Invoices (see above) or statements.
 - 6.15.2. Receipts or other proofs of payment (such as credit card statements or canceled checks)
 - 6.15.3. Course descriptions and grades for course work completed as well as documentation about how courses will help promote academic achievement in one of the core academic areas (reading, language arts, math, social studies or science) for students of individual taking course. (Proof of completion must be accompanied by proof of payment in order for reimbursements to be made to individuals taking a course. Reimbursements may not be made for courses paid for through subsidized student loans.)
 - 6.15.4. Copy of registration, subscription or membership forms that have been submitted to providers by school making the request.
 - 6.15.5. Written answers to questions regarding nature of proposed activities
 - 6.15.6. Confirmation or registration or offer numbers when applicable.
 - 6.15.7. Names of persons for whom a service is being purchased, as well as dates services are to be rendered and a brief description of the activity and how it may be justified as a Title program expense.
- 6.16. **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:
- 6.16.1. Convene parents and staff members to consider uses of Title funds
 - 6.16.2. Submit and track Title program requests
 - 6.16.3. Receive label and inventory Title program materials

- 6.16.4. Attend Title program consultation meetings
- 6.16.5. Attend Title program trainings and workshops
- 6.16.6. Keep track of Title program expenditures
- 6.16.7. Respond to Title program requests for information (such as the Annual Title Program Participation Verification Survey)
- 6.16.8. Communicate with local school community about the role and use of Title funds
- 6.16.9. 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 achievement in core academic areas (reading, math, language arts, social studies or science)
- 7.1.2. Is a part of a school professional development plan that reflects needs identified in a data driven assessment, and
- 7.1.3. Is the result of a decision making process that involves parents and staff members at participating schools.
- 7.1.4. Will be evaluated for effectiveness in order to guide decision making related to future professional development.

7.2. **MPS requests for information about proposed professional development:** The Title Program Request Workbook tab called, "Possible Pro Dev Questions" contains questions that may be asked related to particular requests for professional development. As the questions suggest, 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 the questions referenced above.

7.3. **School discretion on spending under Titles IB, IIA, III, IV and V.** Within limits imposed by individual Title programs, local schools indicate the amount to be spent related to each Title IB, IIA, III, IV and V program request. (Title IV imposes a \$1000 per day limit on professional development. Other Titles use a standard of "reasonableness" of requests.) 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.
 - 7.5.1.2. Title program funds may not be used to repay subsidized loans.

- 7.5.1.3. MPS generally does not prepay tuition, but will honor requests for prepayment if a non-public school requests it due to hardship status of person enrolled in course. Once Title funds are expended in this way, the local school may not expect to recover the funds from MPS if the individual does not successfully complete the course.
- 7.5.2. Reasonable fees for professional development delivered by qualified third parties.
- 7.5.3. Stipends for staff members participating in 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.
 - 7.5.3.2. Schools must submit social security information for staff members being compensated.
 - 7.5.3.3. Reasonable reimbursement rates may be determined by school making request.
- 7.5.4. Stipends for staff members who plan and deliver professional development
- 7.5.5.
 - 7.5.5.1. During times when they are not otherwise compensated by non-public school.
 - 7.5.5.2. 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.
- 7.5.6. Stipends for experienced staff members who serve as mentors for new teachers during hours when they are not compensated by the local school.
 - 7.5.6.1. 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.
- 7.5.7. In some cases, a school requests multiple payments to staff members for participating in the same professional development activity. If such payments are mailed to participants at the school address, one request form may be used to cover all participants. See Ex 2 workbook tab in Title Program request document.
- 7.5.8. Professional development resource materials
 - 7.5.8.1. Books, tapes, software or kits on topics designed to support professional learning goals, for example
 - 7.5.8.2. If such materials are purchase under Title I, they remain in the inventory and control of Title I, though they may be lent to non-public schools for use by staff members currently working with Title I enrolled students.
- 7.5.9. Reasonable expenses for food and materials related to a professional development activity.

- 7.5.9.1. 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.
- 7.5.9.2. Food should not be the focus of a professional development event.
- 7.5.9.3. 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.

7.5.10. Conferences, conventions, workshops and related expenses.

- 7.5.10.1. 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.
- 7.5.10.2. Such events may entail payments for registration, travel, accommodations and a per diem for local travel and meals. *Separate Title program requests are required for each entity to be paid.*)
- 7.5.10.3. MPS will prepay conference related expenses (except for per diems) if requests accompanied by required documentation are submitted at least one month in advance of the event.
- 7.5.10.4. Travel, accommodation and registration arrangements are to be made by conference attendees, who should provide confirmation numbers and registration numbers along with Title program requests.
- 7.5.10.5. Travel and accommodations may also be provided speakers brought to Milwaukee for approved professional development activities.
- 7.5.10.6. Allowable per diem reimbursements vary from city to city and are updated periodically. Contact the MPS Title program office for current information. 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.
- 7.5.10.7. Mileage reimbursement (for travel from Milwaukee to destination city) may be requested for out of town conferences and conventions. Allowable amounts are predetermined and updated periodically. Contact the MPS Title program office for current information.
- 7.5.10.8. Car rentals are not reimbursable unless an activity is located at a place where other means of transportation are needed, but not available.
- 7.5.10.9. Individuals who pay expenses related to an approved professional development activity may be reimbursed directly upon the submission of proofs of payment. Such documentation should be submitted promptly upon the completion of an event.

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

7.5.11.1. 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.

7.5.12. 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)

7.5.12.1. Follow procedures described for subscriptions above.

7.5.13. 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: Academic, Business, Cultural, Inc. (ABC), Catapult Learning, Nonpublic Educational Services, Inc. (NESI) and Learning Exchange. Title I participants work with their service provider to develop professional development activities to support the academic achievement of students who are currently getting Title I services. At least 5% of Title I allocations should go to support professional development, though schools can request that a larger percentage of local funds are expended for this reason. Only staff members who are currently working with Title I students may participate in Title I funded professional development. While Title I 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 I professional development should be planned in close consultation with Title I service providers. (Schools should not expect that Title I funds will be available for any professional development they may have arranged without consultation with their provider.) MPS Title I personnel are available to consult with schools and service providers on professional development issues.

8.2. Title IB (Reading First) allows the range of professional development options available to non-public schools. Only schools that were awarded Reading First grants in the spring of 2004 have access to these funds.

8.3. Title IIA is designed to support professional development to promote student academic achievement in core subject areas. 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.

- 8.4. 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 for individuals who have at least a bachelor's degree. A number of seats are reserved for non-public participants in each course 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. Anne Knackert (438-3677) is the MPS contact person for Title IID activities.
- 8.5. Title III professional development must address the academic achievement needs of the English Language Learning population of the non-public school.
- 8.6. 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.
- 8.7. Title V funds are designed to meet a variety of non-public school needs, including professional development needs. They may be expended in essentially the same way that is described above for Title IIA.
- 8.8. 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.)
- 8.9. 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.
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.

Appendix A:

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

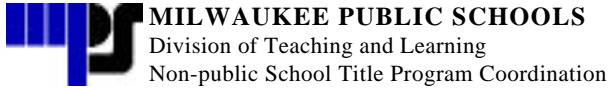
Title I Allocation formula example:
Assuming 20 schools each having 25 students and having F/R lunch percentages that vary by 5% from 5 to 100% and a \$100,000 total allocation; the "magic" allocation number is guessed at until total allocated equals amount available to be allocated. School Allocation formula is Column B X Column C X Magic Number at bottom of Column D. Per Pupil Allocation is found by dividing School Allocation by number of F/R students.

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 I eligible City of Milwaukee students would be set aside for provision of services to eligible students attending non-public schools (after allowable administrative expenses were subtracted from total city allocation).

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

	Column B	Column C	Column D	Column E
	Percent from Free and Reduced Meal Eligible Families	Number of Students from Families with Incomes Qualifying them for F/R School Meals	Total School Allocation (instruction, parental involvement and professional development come from this amount)	Per Pupil Allocation
School	in School			
1	100%	25	\$9,523.80	\$380.95
2	95%	25	\$9,047.61	\$361.90
3	90%	25	\$8,571.42	\$342.86
4	85%	25	\$8,095.23	\$323.81
5	80%	25	\$7,619.04	\$304.76
6	75%	25	\$7,142.85	\$285.71
7	70%	25	\$6,666.66	\$266.67
8	65%	25	\$6,190.47	\$247.62
9	60%	25	\$5,714.28	\$228.57
10	55%	25	\$5,238.09	\$209.52
11	50%	25	\$4,761.90	\$190.48
12	45%	25	\$4,285.71	\$171.43
13	40%	25	\$3,809.52	\$152.38
14	35%	25	\$3,333.33	\$133.33
15	30%	25	\$2,857.14	\$114.29
16	25%	25	\$2,380.95	\$95.24
17	20%	25	\$1,904.76	\$76.19
18	15%	25	\$1,428.57	\$57.14
19	10%	25	\$952.38	\$38.10
20	5%	25	\$476.19	\$19.05
			Total allocated:	\$100,000
			Total available:	\$100,000
			Allocation "magic" number (per pupil amount granted to school with 100% F/R lunch eligible):	\$380.95

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

Please return answers promptly to MPS, attn: Mr. Valent, Room 253, #11 via:

E-mail attachment (preferred method: e-mail reply will confirm receipt) to:
valentec@mail.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 Mr. Valent at (414) 475-8122 or Ms. Golke at (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?

▪ Appendix C

**Allocation Formulas for Titles IIA, IID, III, IV and V
(Using actual 2004-2005 figures in this example)**

Individual School Allocation Formulas for Milwaukee non-public schools; Titles IIA, IV and V: 1) District grant - allowable deductions. 2) % set aside for equitable participation based upon % of Milwaukee resident students attending participating non-public schools (using previous year's data, half day students count as .5 student) 3) Free/Reduced Lunch Equivalent number plus Total Enrollment = Allocation Enrollment; 4) Non-public school equitable participation amount / Allocation enrollment = per pupil amount 5) Per pupil amount X individual school allocation enrollment = individual school allocation. (Public School students not eligible for allocations under Titles IIA or V). Title IID reserves space for non-public schools in approved professional development based upon equitable participation.

Title III Allocation formula: 1) District grant - allowable deductions. 2) % set aside for equitable participation based upon % of Milwaukee resident students designated as English Language Learners (ELL) attending participating non-public schools (using previous year's data) 3) Non-public school equitable participation amount / # of ELL students in DPI ELL levels 1 to 4 = per pupil amount.

Title IIA				
0405 Grant allocations: Public vs. Non-public				
2002-2003 MPS Student enrollment (not including choice, 220 or open enrollment students)	2002/2003 Non-pub enrollment (schools applying for Title IIA)	% school allocations going to non-publics (based on previous year survey)	Total amount allocated (after class size reduction subtracted)	Non-public equitable participation (16% of total available)
97293	18867	16	\$994,788	\$159,166.08
2003/2004 Non-pub enrollment (schools applying for this Title)	2003/2004 Non-pub f/r total (schools applying for this Title)	Allocation Enrollment (enrollment + f/r equivalent total)	03-04 per pupil	2004-2005 Non-public per pupil allocation (allocation/allocation enrollment, all schools)
20491.5	13369.5	33861	13.71	\$4.70
Title IID				
0405 MPS Student enrollment (not including choice, 220 or open enrollment students)				
2002/2003 MPS Student enrollment (not including choice, 220 or open enrollment students)	2002/2003 Non-pub enrollment (schools applying for Title IID)	% school allocations going to non-publics (based on previous year survey)	16% of seats in graduate level Title IID courses will be reserved for non-public participants.	
97293	18002	15.6138601		

Title IV 0405				
2002-2003 MPS Student enrollment (not including choice, 220 or open enrollment students)	2002/2003 Non-pub enrollment (schools applying for Title IV)	% school allocations going to non-publics (based upon previous yr survey)	Total amount allocation	Non-public equitable participation (15% of total)
97293	17535	15	\$1,540,061.00	\$231,009.15
2003/2004 Non-pub enrollment (schools applying for Title V)	2003/2004 Non-pub f/r total (schools applying for Title V)	Total Allocation enrollment	03-04 per pupil	2004-2005 Non-public per pupil allocation (allocation divided by allocation enrollment, all schools)
19647.5	12926.5	32574	7.24	\$7.09
Title V 0405				
2002-2003 MPS Student enrollment (not including choice, 220 or open enrollment students)	2002/2003 Non-pub enrollment (schools applying for Title V)	% school allocations going to non-publics (based upon previous year survey data)	Total amount 8/04allocation	Non-public equitable participation (16% of amount available)
97293	18845	16	\$ 1,119,892	\$179,182.72
2003/2004 Non-pub enrollment (schools applying for Title V)	2003/2004 Non-pub f/r total (schools applying for Title V)	Total Allocation enrollment	03-04 per pupil	2004-2005 Non-public per pupil allocation (allocation divided by allocation enrollment, all schools)
20552.5	13381	33934	7.17	\$5.28041
Title III 0405				
Grant allocations: Public vs. Non-public				
2002-2003 MPS ELL and Native American Student enrollment (not including choice, 220 or open enrollment students)	2002-2003 Non-pub enrollment (levels 1 to 4)	% school allocations going to non-publics (based on previous year survey)	Total amount allocated	Non-public equitable participation (13% of total available)
8020	1245	13	\$946,005	\$122,980.65
		2003/2004 Non-pub ELL enrollment (schools qualifying for this Title)	03/04 per pupil	2004-2005 Non-public per pupil allocation (allocation/allocation enrollment, all schools)
		1454	84.72	\$ 84.58

Appendix D

About the Milwaukee Non-public School Title Program Listserv

Non-public listserv: Anyone interested in the ability to communicate with other Title-program-participating Milwaukee non-public schools through the e-mail listserv can join and participate by following these steps:

1. Send an e-mail to the following address: listserv@mail.milwaukee.k12.wi.us
2. In the body of your e-mail, type: `subscribe non-public`
3. Once enrolled, send e-mails to everyone in the listserv by addressing them to: `non-public@mail.milwaukee.k12.wi.us`

Here is some information about this how listserv works. You are welcome to share subscription information with anyone who may have an interest in sharing on topics related to Milwaukee non-public schools participating in federal Title programs. When you reply to a message to the list, you may reply to the individual who sent the message (especially if your response is personal) or to the entire listserv (if your reply might be of general interest) or both. An MPS e-mail account is not required to participate.

Here are some of the commands for getting listserv information from "Majordomo", our mailing list manager, version 1.94.1. In the description below items contained in brackets are optional. When providing the item, do not include the brackets around it. Items in angle brackets, such as `<address>`, are meta-symbols that should be replaced by appropriate text without the angle brackets.

The listserv computer software understands the following commands:

subscribe non-public [`<address>`] Subscribe yourself (or `<address>` if specified) to the named non-public.

unsubscribe non-public [`<address>`] Unsubscribe yourself (or `<address>` if specified) from the named non-public "unsubscribe *" will remove you (or `<address>`) from all lists. This may not work if you have subscribed using multiple addresses.

get non-public `<filename>` Get a file related to non-public.

index non-public Return an index of files you can "get" for non-public.

which [`<address>`] Find out which lists you (or `<address>` if specified) are on.

who non-public Find out who is on the named non-public.

info non-public Retrieve the general introductory information for the named non-public.

intro non-public Retrieve the introductory message sent to new users. Non-subscribers may not be able to retrieve this.

lists Show the lists served by this Majordomo server.

help Retrieve this message.

end Stop processing commands (useful if your mailer adds a signature).

Commands should be sent in the body of an email message to "Majordomo@mail.milwaukee.k12.wi.us". Multiple commands can be processed provided each occurs on a separate line. Commands in the "Subject:" line are NOT processed. If you have any questions or problems, please contact "Majordomo-Owner@mail.milwaukee.k12.wi.us". Hope this becomes a useful tool for sharing information,

Appendix E

Milwaukee Title IA Information

City of Milwaukee Resident Title IA Non-public School Student Selection & Eligibility, Grades K5-12: General Information

Overview: Non-public schools are required to participate in the Title I student eligibility process as a condition of their participation in Title I programs. Title I service to non-public schools is currently provided through third party vendors and MPS teachers during school year and summer programs that are not limited to traditional school days and hours. The purpose of the student selection and eligibility process is to gather required student information and to help make determinations about those students with the greatest academic needs who will receive Title I services.

Procedures-in-brief: Non-public schools are being provided with a reproducible one page form to be used to compile information for eligibility reports. A one page “quick help” reference is provided with the form. Site administrators are encouraged to meet with relevant staff members to:

- Distribute copies of the form and quick help document to staff members who are working directly with students eligible for Title I services
- Review form completion procedures
- Set deadlines for completion
- Lay out procedures for transmission of the information to Title I personnel for database entry and transmission to the Title I office, and
- Arrange for the beginning of Title I services soon after eligibility information is provided to locally assigned Title I personnel.

Getting Eligibility Report Resources: MPS provides the Title I Student Eligibility database as a download from the internet. This software, available for either a Mac or a PC, is available for school use, but individual schools are not required to use the electronic database. The printable Eligibility Report Worksheet, which is required, along with quick and complete directions are also available on the internet. The URL for the Title I download web page is:

http://www2.milwaukee.k12.wi.us/title_i/Web_Pages/downloads.htm

Due Dates: A copy of updated and complete eligibility lists must be provided by participating schools before services can begin each school year. An updated list is required before the start of spring semester Title I testing. Title I services may not be delivered to any students not included on the Title I eligibility list.

Eligibility Report Inclusions All eligible Title I students, who are below grade level in core academic areas of math, reading or language arts should be listed in eligibility reports. The list should be upgraded as changes are made. All students listed must be ranked and students ranked the highest must all be served before students with lower need are served. (No student may be served unless complete eligibility information is provided. As you make programming decisions, please consider this requirement. Your report should not show service to students of lower rank if any student of higher rank is not being served.)

Completion and Submission of the Eligibility Database Assigned vendors or MPS teachers are required to complete, maintain and submit the electronic database, but will need the cooperation of local school staff to keep the information current. Copies of current eligibility lists should be available for review at each Title I “Targeted Assistance” school. (All non-public schools are “Targeted Assistance” schools under Title I.) The Title I Student Eligibility database called “SendToTitleI” should be sent as an e-mail attachment to Edward C.

Valent, Title I supervisor, at: valentec@mail.milwaukee.k12.wi.us or the completed database should be copied onto a floppy disk or CD. Disks should be sent to the MPS Title I office, Attention Mr. Valent; Room 253, Office 11 in MPS Central Services building at 5225 W. Vliet Street; Mailing Address: PO Box 2181; Milwaukee, WI 53208-2181. State requirements for complex demographic reporting mean that paper only submissions will not be acceptable. Participating schools are required to submit complete eligibility information on paper, at least, to their Title I service provider. Schools do not need to submit the lists directly to the Title I office.

About Title I Services for Milwaukee Resident Students Attending Non-public Schools

Targeted Assistance Status Means that not all students in a school may be served, even if all might be otherwise eligible. All schools run by non-public agencies and some public schools with relatively low concentrations of low income students, are designated as Targeted Assistance programs for Title I. This means that before students may participate in Title I programs, they must: have parental permission to participate, have demographic and eligibility information submitted, and be determined to be among those in the school with the greatest academic needs.

In Targeted Assistance schools, Title I service is designed to benefit students, not their schools. This means that even if available funds and academic needs would suggest that service be extended to a large percentage of students in a school, Targeted Assistance schools may not do so. Consultation about appropriate service levels will ensue when schools request Title I services for a percentage of City of Milwaukee students enrolled that would constitute “service to the school”. Eligibility lists that indicate such high levels of service will prompt those consultations.

Minimum Levels of Service: Title I services are designed to promote high levels of achievement among students who are not meeting grade level expectations for academic achievement in core subject areas. Annual evaluations of students are conducted and ongoing program review and improvement are part of the program. In order to meet goals for significant academic gains, minimum service levels have been established. Title I students will receive a minimum of 120 minutes of instruction in Title I classes each 5 day school week in each subject area for which they receive service. The instruction will take place in at least two weekly sessions and will take place over the course of an entire school year or summer program (except in the case of students who join the program during the course of a school year as openings in the program become available). A small group instruction model is the norm in Targeted Assistance schools. The time and duration of sessions will be a matter of consultation with participating schools. Schools are encouraged to consider going beyond these minimum levels for students served.

History of the MPS Model for Service Delivery to non-public schools: Ongoing consultations between Milwaukee Public Schools and Milwaukee non-public schools led to the adoption of a “third party” model for Title I programs in non-public schools. MPS published a “Request for Proposals” (RFP) for Title I services based upon non-public school input. Non-public school representatives served on the RFP review committee that selected the four current service providers who were then approved by the Milwaukee Board of School Directors. Each year, participating non-public schools are given the opportunity to select one of these four providers of educational services for their school. Consultations about the type and level of service available, given the legal requirements of Title I and the allocation levels of the schools, take place between schools and service providers. Non-public schools may only choose from among the current list of providers for Title I services in Milwaukee.

How was the Milwaukee Service Delivery Plan for Non-public Schools Described in the Request for Proposals?
See below

1.2 PROJECT DESCRIPTION

Title I of the Elementary and Secondary Education Act (ESEA), as amended by the "No Child Left Behind Act of 2001" (P.L. 107-110: NCLB), provides Federal financial assistance to local educational agencies (LEAs) to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging academic standards. Accordingly, Title I requires each participating LEA to provide Title I services to eligible non-public school children. These services must be equitable to those provided to public school children in each LEA.

The purpose of this contract is to ensure that eligible children attending non-public schools in Milwaukee receive equitable Title I service. This procurement is made pursuant to Sections 1120(e) and 9504 of the ESEA. A portion of the Title I allocation to each LEA shall be withheld from the Title I allocation and shall be used in this procurement to provide Title I services to eligible non-public school children.

The target population is non-public school children identified as failing or most at risk of failing to meet challenging State academic content and student academic achievement standards, and who live in the City of Milwaukee and who are enrolled in participating non-public schools.

MPS is inviting qualified vendors to submit proposals to provide professional services for City of Milwaukee Title I eligible students attending participating non-public schools. Services may 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 I regulations.

Vendors should consider that the Milwaukee non-public schools to be served form a diverse community of students in over 100 schools. In 2003-2004 individual school allocations at vendor served schools ranged from \$8 to over \$118,000 with an average of over \$33,000.

This diverse community includes people with many different ethnic backgrounds, some who do not speak or understand the English language, students with exceptional education needs and adjudicated and at risk youth. Schools have expressed interest in services and pricing models that meet their diverse needs. A consultation process revealed the following preferences for service models among participating non-public schools:

- _ Daily services provided at consistent times (as opposed to a one or two days per week model);
- _ Skill building, course-based services lasting a semester or less for students enrolled in middle and high school programs that serve high-risk populations for short periods of time;
- _ Services offered outside of the regular school day, particularly after school, Saturdays or during the summer;
- _ Programs provided at other sites if necessary (transportation expenses might be included in per pupil costs or be provided by non-public schools or families); and

_ Services that continue to make use of Computer Assisted Instruction labs and software currently in place at approximately 48 sites (vendors should consider ways to make use of these resources, where available).

Milwaukee Public Schools reserves the right to make unilateral modifications to this RFP and contract based on any changes in Title I regulations and guidance that are developed and distributed after issuing of the RFP and signing of the contract. The contractor shall agree to implement Title I services governed by this contract in accordance with all applicable Title I statutory and regulatory requirements.

The objective of Title I is to assist eligible non-public school children in acquiring the knowledge and skills necessary to meet challenging State academic content and student academic achievement standards. This objective shall be accomplished by:

_ Providing eligible non-public school children enrolled in participating schools with supplemental educational services such as reading, math, language arts, and other benefits on an equitable basis to those provided to public school students;

_ Using program resources to help participating children to meet challenging student academic achievement standards expected for all children;

_ Using effective methods and instructional strategies that are based on scientifically based research, that provide an accelerated, high quality curriculum and that give consideration to extended learning time;

_ Coordinating with and supporting the educational program in the classroom;

_ Providing instruction by highly qualified professionals in accordance with the ESEA;

_ Providing non-public school teachers of participating children an equitable opportunity to participate in professional development activities;

_ Providing strategies to increase parental involvement and affording parents meaningful opportunities to participate in the education of their children at home and at school; and

_ Reviewing, on an ongoing basis, the progress of participating children and revising the program and services, if necessary, to provide more effective services.

Who are the Local Service Providers? Title I Service providers include Academic, Business, Cultural Academy, Inc. (ABC), Catapult Learning (formerly Sylvan Education Solutions), Learning Exchange and Nonpublic Educational Services, Inc. (NESI). More information, including contact information for the district and these service providers is available at: www2.milwaukee.k12.wi.us/title_i/Web_Pages/non-public.html#anchor2

What do the Service Providers Offer?

What are procedures for dealing with questions or problems?

How may schools work with Title I service providers?

What are some limitations to Title I service in non-public, targeted assistance schools? Title I: Educational service may only be provided for eligible students (City of Milwaukee residents who meet eligibility criterion)

Students need parental permission to participate

Materials may only be used by Title I staff with students enrolled in the Title I program
Programs must be secular and non-ideological and the “public education” identity of the programs must be maintained (This means, for example, that a separate space must be available for Title I instruction. Team-teaching involving Title I and non-public school staff members is not allowed.)
Programs may supplement, but may not supplant the educational work of the non-public school (This means that Title I instruction is unique and in addition to the subject area instruction that is provided by the non-public school. It also means that Title I funds may not be used in place of school funds for activities that are core functions of the school. Title I funds may not, for example, be used to buy textbooks or testing materials that the school would otherwise be purchasing for all of its students or to fund a schoolwide family picnic.)
Must set aside at least 5% of each school’s allocation for professional development of staff members who are working with students currently getting Title I service
Must set aside at least 1% of each school’s allocation for parental involvement activities for parents of Title I students (Schools should consult with service providers regarding professional development and parental involvement expenditures. All such expenditures may only be made through the service provider with their pre-approval. MPS personnel are available to participate in consultation on these issues. Title I money may only be expended for staff members and parents with students who are currently getting service in the Title I program.)
Must annually evaluate both student and program progress (In Milwaukee, this means that all students will be given an annual standardized assessment in the spring as well as diagnostic assessments periodically throughout the school year.)
May only serve schools through one of the options on the menu of services developed by the district in consultation with participating non-public schools
May not compensate non-public school staff members for activities conducted during their work day
May not provide substitute teachers for non-public school staff members or allow Title I staff to serve as substitutes (even on a temporary basis)
May not provide “service to the school” by extending Title I services to too high a percentage of non-public school students.

Questions: Contact Ed Valent, at 475-8122 or Joseph Brown, Title I Coordinator at 475-8009.

Directions for Completing the Non-public Schools Eligibility Database in Data Entry Layout

Download the Eligibility Reports document from:

http://www2.milwaukee.k12.wi.us/title_i/Web_Pages/downloads.htm

You will need to decompress the file (unzip or unstuff). After you have decompressed it, move the stuffed file to the trash or recycling bin and work on the decompressed file to avoid the potential confusion that may come from making multiple copies. Or...

If you are using the database from a CD, in order to save data on the Title I database, you will need to copy the Eligibility Reports folder onto your computers hard drive (this folder contains both the form and the helper application that will run it on your computer). After copying the files from the CD, eject the CD and work with the files on your hard drive. On some Windows based computers, documents copied from a CD will have to be unlocked in order to save information. To do so: A. Right click the Title I Eligibility application, B. Select "Properties" from the list of choices available in the window that opens, C. Deselect "Read only" under the General tab in the Properties window, D. close the Properties window, and E. repeat the steps A, B, C and D or the data file called "Send to Title I".

Find and open the Eligibility Reports document called SendToTitleI.

Enter appropriate information. (To enter information in any field, click in it to place the text insertion point there.) The tab key may be used to advance from field to field.

Student demographic information (beginning with gender) is required for annual Title I reports to the Wisconsin Department of Public Instruction. Select from pull down menus to complete these fields. Sorts for state reports rely on exact matches to pull down menu items.

Ethnicity: Select an ethnicity based upon best available information.

Limited English Proficiency (LEP): If a student's Limited English Proficiency (LEP) inhibits academic growth based upon the judgment and information available to the teacher, then an X should be placed in the box. No entry is needed for non-LEP students. No formal LEP designation is necessary.

Handicap: Mark an "X" in this space only if the non-public school student has any exceptional education need (EEN) as identified by a current multidisciplinary team evaluation. No entry is needed for non-EEN students

Birth Date: Enter full birth date of student.

Grade Level: Use pull down menu to select.

Enrolled in Milwaukee Public Schools: Only check this box for students that are enrolled in MPS. (Some students enrolled in MPS get educational services from non-public agencies. Because some of these agencies serve both MPS and non-public school students, a distinction needs to be made for state reports.)

Eligibility Criterion: Check all that apply. At least one academic need area needs to be identified. Extensive research is not necessary to support multiple eligibility criterion for students. The severity of learning deficits and not the number of criterion is generally more important in assessing Title I needs of individual students.

Not Age/Grade Level Appropriate: Enter an "X" for the non-public school student if the child has been retained in any previous year.

Head Start/Even Start: Enter an "X" for the student, if the child has participated in Even Start or Head Start Programs at any time during the previous two years.

Title I Ranked Need: The classroom teacher and/or local administrator work with Title I personnel to assign a rank score number for each child indicating the level of need. Select one of the following numbers in the appropriate place: 1 = High Need 2 = Moderate Need 3 = Low Need. This information will be used as a starting point for decisions about the students who will get services if more are identified than can be served. All students in highest ranks must be served before service is extended to any students in lower ranks regardless of grade levels. A ranking is required for all students listed.

Title I Subject Area Support: Only check these boxes if students are receiving Title I services in the subject area indicated. While it is possible to serve students in more than one subject area, it is generally not recommended. Serving in multiple subject areas can substantially increase student time away from regular classroom activities or can diminish time available to concentrate on grade level gain in an area of greatest need.

Comments: Not a required field, use at the discretion of Title I personnel.

School Information: The information in the "School Information" box needs only to be entered once for the entire school. E-mail, FAX and MPS site number information is not required, but current enrollment data is required. As a nonpublic program, your site is designated for "targeted assistance". Under controlling legal precedent, Title I services are to be provided for eligible students and not their schools. Serving all or nearly all of the students in a targeted assistance school would constitute service to the school. If Title I subject area support is indicated for an inordinate number of pupils in a school, then the school will be required reduce the number of students served and to resubmit the eligibility report.

For more information about determining eligibility and rankings, see the next three pages.

STUDENT SELECTION GUIDELINES FOR GRADES K4/5 - GRADE 2

The following represents those multiple criteria to be used by the non-public school classroom teacher to make judgments about student needs for Title I service.

The Teacher Recommendation Form is based upon a synthesis of information for grades 1, 2 and kindergarten. The non-public school classroom teacher or local administrator should use the Title I Non-public School Student Identification sheets for students in Grades 1, 2 and kindergarten (kindergarten students are ordinarily listed only to identify students in the spring semester for service during the fall term and/or summer school). After referencing these indicators, the teacher will indicate the "level of need".

STUDENT SELECTION GUIDELINES FOR GRADES 3-12

READING, WRITING/LANGUAGE ARTS AND MATHEMATICS

Enter an "X" in the appropriate space, if in the judgment of the classroom teacher/administrator the student is in need of service in the above area(s). This decision must be based on the following criteria and other available data.

- a. Reading Report Card Grade
 - D or F - High Need
 - C - Moderate Need
 - B (with support) - Low Need
- b. Reading Level
 - 1 year or more below grade level - High Need
 - 1/2 year below grade level - Moderate Need
 - At grade level (with support)- Low Need
- c. Reading Comprehension Score on a Standardized Test
 - 22% or below - High Need
 - 23-39% - Moderate Need
 - 40-59% (with support) - Low Need
- a. Writing/Language Arts Report Card Grade
 - D or F - High Need
 - C - Moderate Need
 - B (with support) - Low Need
- b. A lack of progress in writing as indicated on a variety of dated work samples from a portfolio
- c. Writing/Language Arts Score on a Standardized Test
 - 22% or below - High Need
 - 23-39% - Moderate Need
 - 40-59% (with support) - Low Need
- a. Mathematics Report Card Grade
 - D or F - High Need
 - C - Moderate Need
 - B (with support) - Low Need
- b. Teacher observation of need in problem solving strategies as indicated by daily work, portfolios, or end-of-chapter or unit tests
- c. Mathematics Problem Solving Score on a Standardized Test
 - 22% or below - High Need
 - 23-39% - Moderate Need
 - 40-59% (with support) - Low Need

Non-Public Schools Student Identification
Kindergarten Screening for Title I Services

Assessment of Reading/Language Arts & Mathematics Indicators

DIRECTIONS: Indicate the child's need for additional help by placing a check (✓) mark in the appropriate box. Your input should be combined with other criteria to identify kindergarten pupils who are eligible for Title I service. Kindergarten students are ordinarily listed only to identify students in the spring semester for service during the fall term and/or summer school.

READING/LANGUAGE ARTS/MATHEMATICS INDICATORS	NEED
1. Listens for meaning and responds to stories and poems read aloud.	
2. Uses appropriate language to convey ideas for a variety of purposes.	
3. Demonstrates knowledge about concepts of print.	
4. Recognizes some words and the association between spoken and written language.	
5. Shows interest in independent reading and reading related activities.	
6. Predicts story endings & events using pictures & context; retells story information.	
7. Dictates meaningful thoughts.	
8. Experiments with writing by drawing, copying and using approximated spelling.	
9. Uses the senses to seek information about the environment.	
10. Shows interest in mathematical problem solving.	
11. Recognizes patterns, duplicates and extends them.	
12. Sorts, classifies and orders using a variety of attributes.	
13. Understands the concepts of numbers, quantities and their relations.	
14. Uses appropriate language to discuss mathematical concepts.	

TEACHER'S RECOMMENDATION

NOTE:Based on the needs identified above along with other information about the child, use the scale below and record the "Teacher's Overall Recommendation" on the "Title I Non-Public School Student Selection and Eligibility" form for Grades K-5 through grade 2.

Level of Title I ranked need: 1-High; 2-Moderate; 3-Low

Non-Public Schools Student Identification
 Grades 1 and 2 Screening for Title I Services

Assessment of Reading/Language Arts & Mathematics Indicators

DIRECTIONS: Indicate the child's need for additional help by placing a check (✓) mark in the appropriate box. Your input will be combined with other criteria to identify first and second grade pupils who are eligible for Title I service.

READING/LANGUAGE ARTS/MATHEMATICS INDICATORS	NEED
1. Listen for meaning to stories and text read aloud.	
2. Speak easily to convey ideas in discussion and conversation.	
3. Applies meaning, structure and visual cues.	
4. Predicts and retells stories sequentially.	
5. Uses a variety of strategies to construct meaning and interpret text.	
6. Generates ideas for stories and composes drafts	
7. Writes to convey meaning using approximated and conventional spelling.	
8. Chooses independent reading and writing activities.	
9. Describes & explains mathematical thinking through manipulatives, drawings & words.	
10. Sorts, classifies and compares objects using attributes and quantities.	
11. Models, reads, writes and compares whole numbers.	
12. Uses strategies to solve grade appropriate operations.	
13. Shows a developing understanding of place value	
14. Makes reasonable estimates of quantities and checks answers.	

TEACHER'S RECOMMENDATION

NOTE:Based on the needs identified above along with other information about the child, use the scale below and record the "Teacher's Overall Recommendation" on the "Title I Non-Public School Student Selection and Eligibility" form for Grades K-5 through grade 2.

Level of Title I ranked need: 1-High; 2-Moderate; 3-Low

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

