

# **Equitable Services to Eligible Private School Children**

## **2019-2020 Oklahoma City Public Schools (OKCPS) Federal Programs Consultation Guide**

*The purpose of this document is to begin the process of on-going consultation between OKCPS and private school representatives regarding private school services available from Federal Programs Grants for the subsequent school year. This guide is meant to be an outline of topics for discussion at the annual Private School Consultation Meeting. This guide is for your information only.*

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## **Overview of the Title I, Part A Program**

The Every Student Succeeds Act (ESSA) in §§ 1117 and 8501 requires that timely and meaningful consultation between the local educational agency (LEA) and private school officials occurs prior to any decision that affects the opportunities of eligible private school students, teachers, and other educational personnel participating in the program. Consultation is not a one-time event but should be ongoing throughout the design, implementation, and evaluation of equitable services.

The Title I services provided by the LEA for private school participants are designed to meet their education needs and to supplement the educational services provided by the private school. These services may be provided by the LEA or by a contractor who is independent of the private school and any religious organization. Title I services or benefits must be secular, neutral, and non-ideological.

Key issues relating to the provision of Title I services are discussed during consultation, which provides an opportunity for both the public and private school officials to express their views and to have those views considered. Ultimately, the district is responsible for planning, designing, and implementing the Title I program and may not delegate that responsibility to the private schools or their officials.

As a result, private school officials who want services for their eligible students should be aware of their roles in the consultation process to ensure that Title I programs designed by the LEA effectively meet the needs of their participating children, their teachers, and their families. Roles for the private school officials are:

- Participating in consultation;
- Providing lists of addresses and grades of low-income families;
- Providing lists of names, addresses, and grade levels of children who meet the multiple, educationally related, objective criteria for participation eligibility;
- Complete a Needs Assessment
- Assist with completing a program evaluation
- Suggesting ideas, program designs, and modifications that meet the needs of their eligible children, their teachers, and their families; and
- Providing a dedicated space for services, if appropriate.

Equitable services and other benefits provided under this section for private school children, teachers, and other educational personnel shall be equitable in comparison to services and other benefits for public school children, teachers, and other educational personnel participating in the program and shall be provided in a timely manner.

## **Overview of the Title II, Part A Program**

### **Title II — Preparing, Training, and Recruiting High Quality Teachers and Principals**

#### **Purpose:**

1. increase student achievement consistent with the challenging state academic standards;
2. improve the quality and effectiveness of teachers, principals, and other school leaders;
3. increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and
4. provide low-income and minority students greater access to effective teachers, principals, and other school leaders (sec. 2001)

#### **Funding PD for Private Schools**

The ESSA modified the formulas by which the Department allocates Title II, Part A funds to SEAs and by which SEAs allocate those funds to LEAs. The following sections provide details on the formula changes. This guidance, coupled with the Non-Regulatory Guidance for Title II, Part A: Building Systems of Support for Excellent Teaching and Leading

available at: <http://www2.ed.gov/policy/elsec/leg/essa/essatitleiipartaguidance.pdf>, supersedes the Department's previous guidance on Title II, Part A of the ESEA as amended by NCLB, entitled Improving Teacher Quality State Grants, issued on October 5, 2006.

1. The share of funds allocated based on ages 5 to 17 in poverty relative to the share of funds allocated based on ages 5 to 17 population increase, starting in FY 2018.
1. *(ESEA section 2101 (b)-(c).)*
2. Calculated off the top of the district Title IIA allocation less administrative cost for public and private school programs
3. District remain in control of funds
4. District pays for private school consultants directly
5. District reimburses individual private school educators for tuition, conference registration and travel expenses
6. PD Plan should reflect needs identified from a Needs Assessment
7. Funds for private school activities/conferences must be pre-approved
8. **No Title IIA funds are to be paid to the private school directly.**

### **Overview of Title III, Part A Program**

Title III, Part A is used to identify and provide services to limited English proficient children and/or their teachers or other educational personnel in private schools that are located in the geographic area served by the LEA.

The purposes of Title III-A include the following:

- to help ensure that English learners (ELs) attain English Proficiency,
- develop high levels of academic competence in English,
- and meet the same challenging State academic achievement standards that all children are expected to meet.

### **Overview of Title IV Part A Program**

#### **Title IVA**

The purpose of Title IV, Part A is to improve students' academic achievement by increasing the capacity of States, local educational agencies (LEAs), schools, and local communities to—

- provide all students with access to a well-rounded education;
- improve school conditions for student learning; and
- improve the use of technology in order to improve the academic achievement and digital literacy of all students.

Six focal areas were identified, leading to the development of the first six draft Programs of Excellence rubrics:

1. Fine Arts
2. Mathematics (with an emphasis on improving quality of and access to coursework beyond Algebra 2)
3. Science (with an emphasis on grades PK-5)
4. Social Studies and Civics
5. World Languages
6. Safe and Healthy Schools

## **Services to Private School Children: Guidelines for Allowable Title IA, Title IIA, Title IIIA and Title IVA Expenditures**

### **Timely and Meaningful Consultation**

Sec. 1120(b) of the *No Child Left Behind Act* and Sec. 200.63 of the Title I regulations require that timely and meaningful consultation occur between the local educational agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, their teachers, and their families to participate in Title I programs, and shall continue throughout the implementation and assessment of activities.

### **Allowable Program Expenditures for Title IA**

Title I funds are expended to implement academic research-based programs that help students improve their academic achievement in the regular private school classrooms (i.e., reading, mathematics, etc). Title I program expenditures can include the following:

1. Programs, activities, and academic courses necessary to provide a well-rounded education
2. Expanded learning time (summer, after-school, before school, etc.)
3. Professional Development
4. Parent and community involvement
5. Software subscriptions
6. Tutoring
7. Salaries and fringe benefits for teachers and tutors
8. Books, materials and/or other equipment
  - a. All programs must benefit the eligible students, not the entire school.

### **Allowable Program Expenditures for Title IIA**

1. Technology integration into instruction
2. Teaching students with different needs, disabilities, and limited English proficiency
3. Methods of improving student behavior, identifying early interventions
4. Leadership development for principals and superintendents that results in effective instruction that impacts student achievement
5. Use of data and assessment to improve student outcomes
6. PD activities for teachers, in one or more of the core academic subjects that teachers teach;
7. PD activities for principals to become outstanding instructional leaders;
8. Tuition reimbursement for:
  - a. Teachers-to help students achievement standards achieve challenging State content and academic achievement standards (classes in core academic subjects)
  - b. Principal-to lead their school's effort towards increasing student academic achievement outcomes.
9. Instruction in the early grades/early childhood
10. Understanding when and how to refer children affected by trauma, abuse, or mental illness
11. Addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism
12. Promoting high-quality STEM programs
13. Effective strategies to integrate rigorous academic content, career/tech education, work-based learning

#### **Core Academic Subjects are defined as follows:**

- English
- Reading or Language Arts
- Math
- Science
- Foreign Language

- Civics and Government
- Economics
- Arts
- History
- Geography

### **Allowable Staff**

1. Certified teachers in core academic areas
2. Administrators
3. Other leaders\*

\*From §8501 of ESSA: “The term ‘school leader’ means a principal, assistant principal, or other individual who is:

- a. An employee or officer of an elementary school or secondary school, local educational agency, or other entity operating an elementary or secondary school; and
- b. Responsible for the daily instructional leadership and managerial operations in the elementary school or secondary school building

### **Allowable Activities**

1. Providing high-quality, personalized professional development that is evidenced-based for teachers, instructional leadership teams, principals, and other school leaders, that is focused on:
  - a. Integrating technology into curriculum and instruction
  - b. Using data to improve instruction
  - c. Effectively engaging parents, families, and community partners
  - d. Helping students develop the skills essential for learning readiness and academic success Participating in opportunities for experiential learning through observation
2. Instruction in the early grades/early childhood
3. Implementing formative assessments, designing classroom assessments, using data to improve instruction
4. Understanding when and how to refer children affected by trauma, abuse, or mental illness
5. Addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism
6. Promoting high-quality STEM programs
7. Effective strategies to integrate rigorous academic content, career/tech education, work-based learning

### **Professional Development**

1. Improve content knowledge for a well-rounded education
2. Effective Classroom Practices that improve student achievement
3. Address the needs of students with different learning styles (special needs, gifted/talented, EL)
4. Improve student behavior

\*\*Private school teachers, principals and school leaders are eligible to attend LEA PD events

### **Conferences**

1. Attendee can attend PD Conferences that focus on their current assignment.
2. Travel cost, meals, registration can be paid
3. Federal funds can only be used for “secular, non-ideological” activities if conference is sponsored by a faith-based organization

### **Tuition Reimbursements**

1. Core content coursework that improves educator practices and student outcomes
2. Coursework that improves administrators’ effectiveness in improving educator practices and student outcomes (must be instructional-not operational)
3. All request for tuition reimbursements must have a Educational Assistance Plan attached

### **Allowable Expenditures for Service Providers**

These expenditures include:

1. Salaries and fringe benefits for highly qualified teachers directly hired by OKCPS;
2. OKCPS contracts with third-party providers (The contract should provide information that ensures OKCPS that the Title I program contract will be administered in accordance with all requirements. The LEA must exercise oversight of the instructional program and administrative costs); and
3. OKCPS contracts with retired public or private school teachers to teach at the private school during the school day and before or after school.

## **Location of Services and Equipment**

1. Title IA services must be provided in a separate space that is accessible to OKCPS when services are provided.
  - a. If services are provided in the library or classroom, the space must be partitioned off and separate.
2. Materials purchased with Title IA funds can only be used by eligible Title IA students.
3. Books and other materials purchased with Title I funds are the property of OKCPS and must be labeled in such a manner that it is not easily removed.

The following information must be included on the inventory: Fund Source, Description of Equipment, Serial Number, Acquisition Date, Acquisition Cost, and Location of Purchases.

## **Allowable Program Expenditures for Title IIIA**

Services, not funds, should be designed during consultation and implemented by the LEA. Services should reflect the needs of the private school students and teachers. The process of identifying students is as follows:

- The Home Language Survey is used to identify students who may be identified as English Language Learners depending on English Language Proficiency.
- Students with a language other than English will need to be assessed with an English Language Proficiency assessment such as the Pre-K Screener or the W-APT.
- The Oklahoma State Department of Education provides English Language Proficiency assessments to participating districts and schools at no cost.

The Title III services provided by the LEA for private school LEP students should be designed to meet their educational needs and supplement the educational services provided by the private school.

- The District will provide training on the WAPT English Language Proficiency assessment for private school staff.
- Assessment training, initial identification of students, and testing must be completed and submitted to the District's Title III Office prior to completion of the Private School Participation Form (December/January).
- The participating private school will be given an allocation (September/ October) based on the number of ELL students who reside in the District and are submitted on the Private School Participation Form in the Spring prior.

## **Allowable Activities could include:**

- English Language Development tutoring for students before, during, or after school hours;
- Participation of private school LEP students in English Language Development summer school;
- Participation of students in an English Language Development weekend program; and
- Purchase of supplemental English Language Development instructional materials and supplies.

- **New equitable services guidance –**  
<https://www2.ed.gov/policy/elsec/leg/essa/essaguidance160477.pdf>
- **Title I private school guidance –**  
<http://www2.ed.gov/programs/titleiparta/psguidance.doc>
- **Title IX (all programs other than Title I) –**  
<http://www2.ed.gov/policy/elsec/guid/equitableseguidance.doc>
- **Office of Non-Public Education ESSA page**  
<https://innovation.ed.gov/what-we-do/non-public-education/essa/>



## Overview of the Consultation Process

The goal of consultation is agreement between the LEA and appropriate private school officials on how to provide equitable and effective programs for eligible private school children.  
[ESSA, Sections 1117(b)(1) and 8501(c)(1)(5)]

Successful consultation begins well before the implementation of services, establishes positive and productive working relationship, make planning effective, continues throughout implementation of equitable services, and serves to ensure that the services provided meet the needs of eligible students.

The Oklahoma State Department of Education (SDE) notifies Oklahoma Public School (OKCPS) Districts that it is time to begin consultation for the following school year.

1. The goal of all parties should be to reach an agreement on how to provide equitable and effective programs for eligible private school children.
2. LEA must provide “timely and meaningful” consultation with appropriate private school officials.
3. Timely
  - a. Before the LEA makes any decisions
    - i. Prior to planning for the next school year
  - b. During the design and development of the program
  - c. Meetings shall continue throughout implementation and assessment of services provided under this section.
4. Meaningful
  - a. Genuine opportunity for parties to express their views
    - i. Edgar 76.652
  - b. Views seriously considered
  - c. The LEA may initiate consultation with the proposal for services
    - i. Final decisions made by the LEA after consultation
5. OKCPS must work in conjunction with the private school to determine the following for each program:
  - a. How the children’s needs will be identified
  - b. What services will be offered
  - c. How, where, and by whom the services will be provided
  - d. How the students will be assessed and how the results of those assessments will be used to improve those services
  - e. The size and scope of the equitable services to be provided to eligible nonpublic school children, teachers, and other educational personnel, and the amount of funds available for those services
  - f. How and when the agency, consortium or entity will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the nonpublic school officials on the provision of services through potential third-party providers;
  - g. size and scope of equitable services;
  - h. administrative costs;
  - i. the method/sources of poverty data used; (Title I only)
  - j. whether to provide equitable services to eligible nonpublic school children-
    1. by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(C) based on all the children from low-income families in a participating school attendance area who attend nonpublic schools; or
    2. in the agency’s participating school attendance area who attend nonpublic schools with the proportion of funds allocated under subsection (a)(4)(C) based on the number of children from low-income families who attend nonpublic schools (ESSA 8501 (c))

## Procedures

### Step I – Declaration of Intent to Participate in Federal Programs and Statement of Assurances for Private Schools (Document A)

Date OKCPS received letter of notification:	
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OKCPS sends out a memorandum to all private schools to invite representatives to an initial consultation meeting that will serve as an overview for Title I and other applicable federal programs. The memorandum includes two forms, Declaration of Intent to Participate and the District Affirmation of Consultation with Private School officials. The memorandum and enclosures are sent through the mail. If private schools do not wish to participate they are requested to contact Charleen Hudson, Title I School Support Coordinators at 405-587-0100 or e-mail [clhudson@okcps.org](mailto:clhudson@okcps.org). The information concerning the private schools that do not intend to participate is collected on a spreadsheet.

Date OKCPS sent memorandum:	
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### Step II – District Affirmation of Consultation (Document B)

Each year OKCPS staff holds an initial consultation meeting to provide an overview of each federal program, including Title I. During the initial consultation meeting many topics are discussed and the District Affirmation of Consultation is signed by OKCPS staff and the appropriate private school officials. OKCPS staff shares forms, sample documents, and resource information. Individual or representative consultations will be scheduled at this meeting. Agendas, sign-in sheets, and meeting minutes are maintained.

Date OKCPS initial consultation meeting held:	
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### Step III – Poverty Criteria (Document C)

During consultation OKCPS in consultation with the private school officials will determine the appropriate measure of poverty from the following: Free lunch program participation form, Temporary Assistance for Needy Families Form (TANF), Medicaid Assistance Form, Homeless Student, or other established criteria. If using the free lunch program data the cut-off date is October 1.

Once the criterion is determined, private school officials should provide a list of addresses and grade levels. OKCPS staff will identify the attendance area in Infinite Campus to ensure that the address is located in a participating OKCPS Title I school site. The private schools officials should not provide the names of the families or students. Documentation with identifying data should remain on file at the private school available for review by OKCPS staff. The amount of funds generated for instruction will be calculated using the same per-pupil amount as used for the public school students in the participating public school attendance area.

1. Poverty Criteria Selected:

### Step IV – Selection of Students (DOCUMENT D)

In consultation with private school officials, OKCPS staff will create a list of names, addresses, and multiple, educationally related criteria used to identify private school students. OKCPS staff will confirm that the students live in a participating attendance area.

List of Students Attached:	Due
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1. How will the specific needs of eligible private school students and/or educators be identified? Check applicable method(s) and briefly describe the method's use.

METHOD	X	BRIEF DESCRIPTION
Assessment Tool		
Survey		
Teacher Committees		
Parent/Teacher Recommendation		
Rank Order		

2. The Private School Official is responsible to build a **Rank Order** list. To be eligible for Title I services, a private school child must reside in a participating public school Title I attendance area AND be failing or most at risk of failing to meet high standards on the basis of multiple, educationally-related, objective criteria. As spreadsheet used to determine academic need will be used by the regular classroom teacher to show how students are currently performing. This form labeled a Determining Educational Need form. The school official will send an initial rank order list and update list regularly to record students that need to be added dismissed. Through consultation between the LEA and private school official a list of students eligible for services that show the students with the most need are identified and served.

**Step V – Program Design**

In consultation with private school officials, OKCPS staff will determine the appropriate services to meet the student needs, assessments, materials/supplies, and the location of the services. In addition to designing the instructional program, OKCPS staff will determine the appropriate services for eligible private school teachers and families.

Using allocation amounts (as available) OKCPS will develop a budget and inform the private school officials of tentative program designs, service delivery models, number of Title I participants, allocations, location of services, and estimated costs. Private school representatives may comment.

**Tutors**

Any personnel that private school representatives wish to recommend for employment in the program must have the following documents in order to be considered for employment with OKCPS:

- Sex Offenders Affidavit
- Oklahoma State Teaching Certificate (OKCPS staff will verify certificate status)
- Recent Background Check
- Temporary Employee Contract
- Any additional forms that OKCPS Human Capital Department deems appropriate.

The Oklahoma State Teaching Certificate and the Recent Background Check should be filed in the private schools site folder.

Tutors must meet the definition of highly qualified teachers as required in NCLB section 1119. Paraprofessionals may not be hired as tutors.

**Payment for Services**

To receive payment for tutoring services rendered, the tutor must submit a completed monthly tutoring log (Document D & E). An OKCPS staff member will verify the information submitted on the tutoring logs and complete a goods receipt (GR). Once the Stipend Request Form and GR is completed by the Financial Manager, it is approved by the Executive Director of Federal Programs. The invoice is verified and delivered to The Purchasing Department. The Purchasing Department will process the invoice and a check will be distributed to the tutor.

1. If known, enter the names of the OKCPS tutors providing services.

<b>Tutor Name</b>	<b>Teacher Number</b>	<b>Subject Area</b>

**Instructional Materials**

Technology purchases must be approved by the Oklahoma City Public Schools Information Technology Department. A Technology Purchase Request (TPR) must be completed before the purchase order is started. Once the TPR is approved the form should be placed in the private school site’s file folder. Completion of the ordering process and TPR form will be conducted by OKCPS staff.

Inventory and labeling will be maintained by OKCPS staff. Inventory will be completed as items are received at OKCPS. Tutors may be asked to annually review the inventory to ensure the spreadsheet is current and accurate. Non-consumable supplies, materials, and equipment purchased with Title I funds, will be labeled by OKCPS staff as the items are received.

Sample:

Property of OKCPS - Title I Program - FY 2018-2019

1. What types of services/materials are required to meet the needs of eligible private school students and educators? Briefly describe the services and materials needed. If the private school chooses to participate in the public school district’s program, cite the program.

<b>SERVICES/PROGRAM</b>	<b>MATERIALS</b>
Tutoring (includes before/during/after/ intersession/summer school)	
Parental Involvement	

2. Where and by whom are services to be delivered? Check the applicable service provider.

SERVICE PROVIDER	X
Private school location with public school personnel	
Public school location with its own personnel	
Private school with third party or independent contractor	
Off site with third party or independent contractor	
Other:	

3. What assessment tools will be used to evaluate the effectiveness of the services? Check applicable method(s) and briefly describe the method’s use.

METHOD	X	BRIEF DESCRIPTION
Assessment Tool		
Survey		
Other		

If necessary, the methods listed above will be used to modify the services provided.

**Step VI – Entrance/Exit Criteria and Process**

To be eligible for Title I services, a private school child must reside in a participating public school attendance area and must meet the requirements in Section 1115 (b) of Title I, which states that children be identified as failing or at risk of failing on the basis of multiple, educationally related, objective criteria. Certain children may be identified as eligible solely by virtue of their status; for example, homeless children or children who participated in Head Start, Even Start, or Early Reading First within the past two years are eligible for Title I services. Children from preschool through grade 2 are selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

**Entrance Criteria (Document H)**

The process for adding new private school students to the program is as follows: at the beginning of the school year, private school representatives will submit a list of eligible students to be added to the Title I program to an OKCPS representative. Once OKCPS verifies the eligibility of the students, the additional students will be added, as applicable, to the tutoring program.

Although it is not a criteria for eligibility, it is highly recommended by OKCPS that private school principals obtain written parental/guardian permission to participate in the Title I program.

Criteria for eligibility:

- 1) Student must reside within OKCPS district attendance boundaries.
- 2) Student must be identified as failing or at risk of failing on the basis of multiple, educationally related, objective criteria and/or teacher or parent recommendations.

Once the above two criteria are met, the following must also be established to receive services:

- 3) Student must be identified on a rank-order list.
- 4) In addition to the assessment data, the student must be pre-tested.

### **Exit Criteria (Document I)**

The process for students to exit the program is as follows: as needed throughout the school year, private school representatives will submit a list of eligible students to exit the Title I program to an OKCPS representative. The OKCPS representative will then delete from services the applicable student.

Criteria for exiting:

- 1) A classroom teacher or parent recommends a student exit the program, or
- 2) Student assessments show enough gain over a semester time period that the supplemental program is no longer needed.

### **Classroom Teacher Recommendation (Document J)**

### **Two Way Communication (Document K)-Due to LEA bi-weekly**

### **Step VII – Title I Program Evaluation (Document L)**

OKCPS uses multiple criteria to evaluate the program. At the end of the program OKCPS and/or, if applicable, a third party vendor will send the Title I teachers in each of the private schools surveys for participating students, parents, Title I tutors, and teachers to assist in evaluating the program. OKCPS will also work with the schools to get comparative data from using an annual progress measure form.

Additional methods for evaluation are the Pre and Post Assessment Form (Document J), the OKCPS has a District Evaluator that annually evaluates the private school program, and an OKCPS representative at a minimum will attend two tutoring sessions per school year.

## Oklahoma City Public Schools Timeline for Consultation with Private School Officials

Month	OKCPS Activity	Legal Basis**	Pooling Option
<b>November</b>	<p>Obtain complete list of all private schools with students who are residents of OKCPS.</p> <p>Meet with private school officials to review timeline and consultation process. Establish a consultation calendar and procedures for collecting poverty data (i.e. data on low-income families).</p>	<p>OKCPS uses list to ask all private school officials if they want their eligible students to participate in Title I the next school year.</p> <p>See §1120(a) of the <i>Elementary and Secondary School Act</i>.</p>	<p>Complete draft Request for Proposal (RFP) for Third-Party Provider.</p>
<b>November through December in preparation for the next school year</b>	<p>Obtain from principals or a central office serving a group of private schools the following poverty data (as appropriate) for private school students:</p> <ul style="list-style-type: none"> <li>• Same poverty measure used to count public school students, which is usually free and reduced-priced lunch;</li> <li>• Survey of private school parents asking for income data, address, and grade level of children from which OKCPS staff must extrapolate this data;</li> <li>• Alternative poverty data such as scholarships, Temporary Aid to Needy Families, Medicaid, etc.</li> </ul>	<p>Private school students from low-income families who live in Title I participating public school attendance areas generate funds for instructional services.</p> <p>See §1120(c)(1) &amp; §200.78(a)(2) of the Title I regulations.</p>	<p>Draft RFP to be reviewed by appropriate staff –</p> <ul style="list-style-type: none"> <li>• Public School</li> <li>• Private School(s)</li> </ul> <p>If applicable,</p> <ul style="list-style-type: none"> <li>• SDE</li> <li>• USDE</li> </ul>
<b>November through December in preparation for the next school year</b>	<p>Match addresses of private school students from low-income families to participating public school attendance areas.</p> <p>Estimate the amount of funds generated for instruction using the same estimated per-pupil amount as that used for public school students in participating public school attendance areas.</p> <p>Consult with private school officials to discuss poverty data collected, amount of estimated instructional funds generated, and determine if funds will be pooled, not pooled, or a combination of both options.</p>	<p>See §1120(b)(1)(f) &amp; (2) and §200.64(a).</p>	<p>February – RFP released</p> <p>March – Proposals due</p>

\*\* This column references Title I, Sec. 1120 and 34 *CFR* 200.

Month	OKCPS Activity	Legal Basis	Pooling Option
<p><b>November through December in preparation for the next school year</b></p>	<p>Determine the multiple, educationally related, objective criteria to be used to select eligible students (educationally needy students who reside in Title I attendance areas) in consultation with private school officials.</p> <p>Obtain from private school officials lists of names, addresses, and grades of private school students who meet the criteria.</p> <p>From these lists, select for Title I services those students most at-risk of failing, as decided in consultation.</p> <p>Discuss with private school officials the needs of selected students, appropriate Title I services to serve those needs, and location of services.</p> <p>Design services that meet participants' needs based on consultation, using the estimated amount of funds generated by private school students from low-income families, and the equitable share of funds reserved for districtwide instructional activities.</p> <p>Determine with private school officials the standards and annual assessments for measuring progress of the Title I program.</p> <p>Define annual progress. Determine criteria for making program modifications when annual progress is not achieved.</p> <p>Assess the achievement of <b>current year's</b> program using the standards previously agreed upon last year.</p> <p>After appropriate consultation, make modifications to next year's Title I program, if annual progress has not been met.</p>	<p>Multiple, educationally related, objective criteria required under §1115(b). See §200.62(b).</p> <p>See §1120(b).</p> <p>See §200.62(b)(2).</p> <p>See §1120(b)(1) and §200.63(a) and (b).</p> <p>See §200.64.</p> <p>LEA must assess quality and effectiveness of Title I program each year. LEA modifies the design of services if annual progress is not met.</p> <p>See §1120(b)(1)(D) and §200.63(b)(5).</p>	<p>Proposals Reviewed</p>



Month	OKCPS Activity	Legal Basis	Pooling Option
<p><b>November through December in preparation for the next school year</b></p>	<p>Determine in consultation with private school officials the professional development and parent involvement needs of private school teachers and families of private school participants.</p> <p>Design activities that district will implement the next school year (independently or in conjunction with district activities) for teachers and families of participants.</p> <p>Inform private school officials of tentative program designs, service delivery models, number of Title I participants, allocations, location of services, and estimated costs. Provide opportunities for private school officials to comment.</p> <p>Update private school officials if there are any changes. Generate a list of students who will receive Title I services beginning in September of the next school year.</p> <p>Obtain written affirmation from private school officials or their representatives that timely and meaningful consultation has occurred. Consultation must be ongoing, however, and should continue throughout the school year.</p> <p>Complete all necessary reports, contract negotiations, ordering of materials, hiring of teachers, etc. Consultation should be completed for the next school year prior to district submitting its Title I application to the Oklahoma State Department of Education (SDE).</p>	<p>Equitable services for teachers and families of participants apply to funds reserved under §§1118 and 1119. See §1120(a) and §200.65.</p> <p>LEAs must provide opportunities for consultation with private school officials if program is modified or private school officials request more discussion. See §1120(b) and §200.63.</p> <p>See §1120(b)(4) and §200.63(e).</p> <p>These actions ensure that programs will begin at the start of the school year. See §1120(a)(3) and §200.62(a)(1).</p>	<p>Third-Party Contract Awarded</p>
<p><b>November through December in preparation for the beginning of school year</b></p>	<p>Report on readiness of Title I program for private school participants to private school officials.</p>	<p>Private school officials should be aware of how the district will implement the program in September, including staffing, number of students to be served, location, etc. See §1120(b)(2) and §200.63(c).</p>	<p>Third-Party plan reviewed with private school officials.</p>

Month	OKCPS Activity	Legal Basis	Pooling Option
<b>August/September of school year</b>	<p>OKCPS begins Title I services for students identified the previous spring as participants and provides private school officials with their names, services to be provided, and names of Title I teachers.</p> <p>Obtain a list of newly enrolled students who meet eligibility criteria. Consult with private school officials on how new students might be accommodated in the program.</p> <p>Initiate professional development and parent involvement activities based on previous spring's consultation.</p>	<p>See §1120(a)(1) and §200.62(a)(1).</p> <p>See §200.65.</p>	<p>Third-Party Provider implements plan.</p>
<b>September/October of school year</b>	<p>OKCPS provides information about possible adjustments and program changes to private school officials.</p> <p>Start planning for the next school year's consultation cycle.</p>	<p>See §1120(b)(2) and §200.63(c).</p>	

## Complaint Process for Private School Officials

Under Title I, a local education agency (LEA) is required to provide to eligible private school children, their teachers, and their families Title I services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families. Private school officials have recourse through the complaint process if they do not believe their eligible children, teachers, or families are receiving equitable services. Section 1120

### Timeline of Complaint Process

1. Contact district officials
2. Contact OSDE official
  - Under ESSA, a new position at the state level of ombudsman has been created.-

Naomi Ward

Program Specialist

405-522-3218

[Naomi.Ward@sde.ok.gov](mailto:Naomi.Ward@sde.ok.gov)

Aspects of the complaint process that the private school officials should know:

- A private school official has a right to complain to the state educational agency (SEA) that the LEA did not engage in a timely and meaningful consultation process or did not give due consideration to the views of the private school officials. Any dispute regarding the accuracy of low-income data for private school students also can be the subject of a complaint.
  - 1) A statement that the SEA, LEA, or other entity receiving federal financial assistance has violated a requirement of a federal statute or regulation that applies to a program requiring equitable participation.
  - 2) The facts on which the statement is based and the specific statutory or regulatory requirement allegedly violated; and
  - 3) The signature of the complainant.
- The SEA is required to have complaint procedures in place as required by Sec. 34 *CFR* 299.10–12. Included in these procedures is a reasonable time by which the SEA must respond in writing to the complaint.
- No later than 30 days following the written response by the SEA, or in the event the SEA fails to resolve the complaint within a reasonable period of time, the private school official may appeal the decision of the SEA to the Secretary of the U.S. Department of Education. Such appeal must be accompanied by a copy of the SEA's written response, if available, and a complete statement of the reasons supporting the appeal.
- The Secretary must complete an investigation of the complaint and resolve the appeal within 120 days after receipt of the appeal.

## Resources

Oklahoma City Public Schools Private School Web page	<a href="http://www.okcps.org/departments/federalprograms/privateschools/tabid/1763/default.aspx">http://www.okcps.org/departments/federalprograms/privateschools/tabid/1763/default.aspx</a>
Ensuring Equitable Services to Private School Children – OKCPS Consultation Plan	Provided at the initial consultation meeting
No Child Left Behind – Services to Private Schools	<a href="http://www.sde.state.ok.us/NCLB/Private.html">http://www.sde.state.ok.us/NCLB/Private.html</a>
Oklahoma State Department of Education Complaint Procedures	<a href="http://www.sde.state.ok.us/NCLB/pdf/FedPrograms/Complaint.pdf">http://www.sde.state.ok.us/NCLB/pdf/FedPrograms/Complaint.pdf</a>
Ensuring Equitable Services to Private School Children – A Title I Resource Toolkit	<a href="http://www.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf">http://www.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf</a>
Title I Services to Eligible Private School Children Non-Regulatory Guidance – October 17, 2003	<a href="http://www.ed.gov/programs/titleiparta/psguidance.doc">www.ed.gov/programs/titleiparta/psguidance.doc</a>
Title IX, Part E Uniform Provisions Subpart I – Private Schools Non Regulatory Guidance – March 2009	<a href="http://www.ed.gov/policy/elsec/guid/equitablesrguidance.doc">www.ed.gov/policy/elsec/guid/equitablesrguidance.doc</a>

### OKCPS Federal Programs Contacts Regarding Private Schools

NAME/TITLE	PHONE NUMBER	E-MAIL
<b>Federal Programs</b>		
Terry Fraley <i>Executive Director of Federal Programs</i>	587-0160	<a href="mailto:tfraley@okcps.org">tfraley@okcps.org</a>
Charleen Hudson <i>School Support Coordinator</i>	587-0100	<a href="mailto:clhudson@okcps.org">clhudson@okcps.org</a>
Tomomi Wall <i>Financial Services Manager</i>	587-0172	<a href="mailto:tkajinumawall@okcps.org">tkajinumawall@okcps.org</a>
<b>Title III</b>		
Chris Berry <i>Director of Language and Cultural Services</i>	587-0172	<a href="mailto:cwberry@okcps.org">cwberry@okcps.org</a>

- If you wish to participate with Oklahoma City Public Schools for the 2019-2020 school year, please complete documents A-D and return them to Charleen Hudson at [clhudson@okcps.org](mailto:clhudson@okcps.org) on or before **Wednesday, December 20<sup>th</sup>**
- Mail forms to Oklahoma City Public Schools, 3100 N. Kelley Ave. OKC, OK 73111 or Fax-405-587-1225
  - **For Title I, we need the low-income addresses and grade levels ASAP**
  - If you DO NOT wish to participate with Oklahoma City Public Schools in the 2019-2020 school year, please complete document A only, checking the box at the bottom that you DO NOT wish to participate

# Documents

**Declaration of Intent to Participate in Federal Programs for Nonpublic Schools**

1. Title I, Part A – Improving the Academic Achievement of the Disadvantaged
  - Do you intend to participate? Yes \_\_\_\_\_ No \_\_\_\_\_
  - If yes, please include the total number of Title I nonpublic students from the district attendance area as of October 1, 2018 \_\_\_\_\_
  
2. Title I, Part C – Education of Migratory Children
  - Do you intend to participate? Yes \_\_\_\_\_ No \_\_\_\_\_
  - If yes, please include the total number of nonpublic Migrant students from the district attendance area identified through a Certificate of Eligibility \_\_\_\_\_
  
3. Title II, Part A – Preparing, Training and Recruiting High-Quality Teachers, Principals and Other School Leaders
  - Do you intend to participate? Yes \_\_\_\_\_ No \_\_\_\_\_
  - If yes, please include the total number of nonpublic student enrollment (Ages 5-17) \_\_\_\_\_
  
4. Title III, Part A – Language Instruction for English Learner and Immigrant Students
  - Do you intend to participate? Yes \_\_\_\_\_ No \_\_\_\_\_
  - If yes, please include total number of nonpublic English Learner (EL) students identified through English Language proficiency testing as of October 1, 2018 \_\_\_\_\_
  - If yes, please include total number of nonpublic Immigrant students identified through enrollment as of October 1, 2018 \_\_\_\_\_
  
5. Title IV, Part A – Student Support and Academic Enrichment
  - Do you intend to participate? Yes \_\_\_\_\_ No \_\_\_\_\_
  
6. Title IV, Part B – 21<sup>st</sup> Century Community Learning Centers
  - Do you intend to participate? Yes \_\_\_\_\_ No \_\_\_\_\_

**\*By signing below, the nonpublic official and LEA affirm that timely and meaningful consultation has occurred before the LEA made any decision that affected the participation of eligible nonpublic school children under ESSA.**

Terry Fraley		Oklahoma City Public Schools	55	I-089
Public School Official (Print Name and Signature)	Date	Public School District Name / County # / District #		

P.O. Box 36609, Oklahoma City, OK 73136	405-587-0110
Public School District Address	Public School District Phone Number

Nonpublic School Official (Print Name and Signature)	Date	Name of Nonpublic School
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Nonpublic School Address	Nonpublic School Phone Number
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**District Affirmation of Consultation with Private School Officials**

To ensure timely and meaningful consultation, the LEA shall consult with appropriate nonpublic officials during the design and development of programs under this part. LEA and nonpublic officials should both have the goal of reaching agreement on how to provide equitable and effective programs for eligible nonpublic school children, the results of which agreement should be submitted to the SEAs equitable services ombudsman. ESSA Sec. 1117(b)(1). **\*required**

**Please check all that apply:**

- how the children’s needs will be identified;
- what services will be offered;
- how, where, and by whom the services will be provided;
- how the services will be assessed and how the results of the assessment will be used to improve those services;
- the size and scope of the equitable services to be provided to the eligible nonpublic school children, teachers, and other educational personnel, the amount of funds available for those services;
- how and when the agency, consortium or entity will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the nonpublic school officials on the provision of services through potential third-party providers;
- size and scope of equitable services;
- administrative costs;
- the method/sources of poverty data used; (Title I only)
- whether to provide equitable services to eligible nonpublic school children-
  - a) by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(C) based on all the children from low-income families in a participating school attendance area who attend nonpublic schools; or
  - b) in the agency’s participating school attendance area who attend nonpublic schools with the proportion of funds allocated under subsection (a)(4)(C) based on the number of children from low-income families who attend nonpublic schools (ESSA 8501 (c))

**\*Affirmation that timely and meaningful consultation has occurred and shall continue throughout the implementation and evaluation of services under ESSA. Please check one:**     **AGREE**     **DISAGREE**

Terry Fraley		Oklahoma City Public Schools	55	I-089
Public School Official (Print Name and Signature)	Date	Public School District Name / County # / District #		

P.O. Box 36609 Oklahoma City, OK 73136	405-587-0110
Public School District Address	Public School District Phone Number

Nonpublic School Official (Print Name and Signature)	Date	Name of Nonpublic School
--	------	--------------------------

Nonpublic School Address	Nonpublic School Phone Number
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Determining Educational Need for Title I Services – Grades 3-8, Reading

Student Name \_\_\_\_\_ Date \_\_\_\_\_ Grade \_\_\_\_\_

Teacher Name \_\_\_\_\_ School \_\_\_\_\_

Directions: Check all that apply, total each section, and calculate total points.

TESTING (30 points) POINTS

- \_\_\_ Achievement test score (i.e., ITBS, Aspire) below 50th percentile
OR
\_\_\_ Other reading assessment (i.e., STAR) below grade level

CLASSROOM WORK (30 points)

- \_\_\_ Classroom performance below grade level
Current grade percentage \_\_\_\_\_

SKILLS and DISPOSITIONS (5 points each)

- \_\_\_ Lacks phonemic awareness
\_\_\_ Lacks phonetic skills/structural analysis
\_\_\_ Vocabulary limited
\_\_\_ Reading fluency is limited or lacking – poor expression
\_\_\_ Lacks understanding of word meanings
\_\_\_ Comprehension skills are limited or lacking
\_\_\_ Poor oral communication
\_\_\_ Poor written communication

TOTAL POINTS \_\_\_\_\_

\*\*\*Duplicate these pages as needed.\*\*\*

Criteria

1. Collect data for the 2 selected and/or Math.

School:

Reading Skills and Dispositions

Subject:

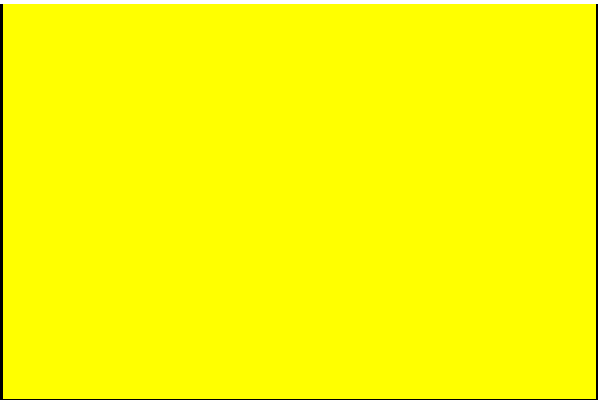


**Grade: (*circle one*) 1st or 2nd**

**Criteria Cutoff Score: 50**

**Date:**

**This form will need to be resubmitted each time a student is added or deleted.**



Student Name	Teacher Name	Points assigned to each criteria	Served (+) OR Not Served (-)	Reason For Exclusion
		75	25	100

<b>Total Number of Eligible Students</b>		
<b>Total Number of Participants</b>		

**List students receiving services in order of greatest to least need. This is your rank order list.**

Student Name	Grade	Total Criteria Points- Reading	Student Name	Grade	Total Criteria Points-Math

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**Document F**

Oklahoma City Public Schools

2018-2019 Private School Tutoring Log

For the month of:	Date Submitted:
Private School Name:	Tutor Name:

*\*All tutorial appointments must be documented. Complete and correct time sheets/logs not submitted by the due date may result in delayed payments.*

Tutor Time Sheet

Date	Time In	Time Out	Total Hours	Number of Students Tutored Per Session <i>(Students must be signed in on page 2 of this document.)</i>



Monthly	Total	Hours:		_____

Revised 8-8-18

To the best of my knowledge, I certify the information on this document to be correct.

Tutor signature: \_\_\_\_\_

**DOCUMENT G**

Oklahoma City Public Schools  
 2018-2019 Private School Tutoring Log  
 Student Sign-In Sheet

*\*Students must be identified on the Rank Order List.*

Tutoring Date	Tutoring <b>Start</b> Time	Grade	Student Name (Printed or Typed)	Student Signature	Tutoring <b>End</b> Time


Revised 8-2-18

*\*To assist in the sign-in process, early childhood (KG-3<sup>rd</sup> grade) students may write their initials instead of writing their full name as a signature.*

**Tutor Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

OKCPS Private School Student List  
 Add to Title I Services  
 2018-2019

Date: \_\_\_\_\_

Directions: If funds and slots allow, please **ADD** the following eligible student(s) to the Title I program. Return the completed form to Charleen Hudson at [clhudson@okcps.org](mailto:clhudson@okcps.org).

Private School Name	Student Name	Address	Zip	Grade	Classroom Teacher Name	Title I Tutor Name	Reading or Math or Both	Pre Assessment Score

OKCPS Private School Student List  
*Delete from Title I Services*  
2018-2019

Date: \_\_\_\_\_

Directions: Please **DELETE** the following student(s) from the Title I program. Return the completed form to Charleen Hudson at [clhudson@okcps.org](mailto:clhudson@okcps.org).

Private School Name	Student Name	Title I Tutor Name	Post Assessment Score	Reason Student is Exiting the Program?

## Classroom Teacher Recommendations of Students for Title I Services and Eligibility Status

School Year 2018-2019

Dear Classroom Teacher,

To facilitate the identification of academically needy students for possible Title I services, please complete the form below and return to the Title I tutor as soon as possible, but no later than \_\_\_\_\_. OKCPS will verify that they reside within the OKCPS boundary area to be eligible for services.

Once OKCPS verifies that the address is within the OKCPS boundary area, you will be asked to complete the short ***Determining Educational Need for Title I Services*** form. Students will be ranked based on the score on the form, and those with the greatest academic need will be eligible to participate in Title I services.

The Title I tutor will prepare the required parental permission slip form to be sent home.

Private School \_\_\_\_\_ Classroom Teacher: \_\_\_\_\_

Title I Tutor \_\_\_\_\_ Page \_\_\_\_\_ of \_\_\_\_\_

Name of Student	Address with Zip Code	Grade Level	Reading, Math or Both	Current Grade Percentage	Eligibility Status Yes or No OKCPS Attendance Area- School (Yes) or Out of District Name (No)
Example: Courtney Smith	1234 SW 44 <sup>th</sup> St., 73119	3rd	Reading & Math	Reading-65% Math-45%	<i>OKCPS Determination</i>

**Two-Way Communication Form to Align  
Title I Services with Instruction in the Classroom 2016-2017**

Today's Date:		Title I Tutor Name:	
Classroom Teacher Name:		Unit Dates:	
Subject:	<input type="checkbox"/> Reading, Phonics, and Word Analysis <input type="checkbox"/> Reading Comprehension <input type="checkbox"/> Math Concepts and Application <input type="checkbox"/> Math Computation		

<u>Names of Student(s)</u>	<u>Grade(s)</u>

Dear Classroom Teacher,  
 As the Title I tutor, I have filled in the appropriate information below. Please do the same in the area marked "classroom teacher current objectives." Please return the form to me by the date below so I know if the Title I program is supporting your instruction. You may want to keep a copy for your records.

**Title I recently taught objectives:**

**Classroom teacher current objectives:**

Classroom teacher: I would like to request a meeting with the Title I tutor:  Yes     No

Please return this form by: \_\_\_\_\_

Oklahoma City Public Schools  
Private School Assessment Information

School Year 2018-2019

Directions: Please complete this form and return to Charleen Hudson at [clhudsonokeps.org](http://clhudsonokeps.org). If needed, you may insert extra lines below to add additional students to the chart.

**Pre-Assessment**

Student Name	Grade	School Name	Name of Assessment Used	Date Pre-Assessment Given	Pre-Score	Interpretation of Score Ex: GLE, NPR, description of deficits

**Post-Assessment**

Student Name	Grade	School Name	Name of Assessment Used	Date Post-Assessment Given	Post-Score	Interpretation of Score/Growth Ex: GLE, NPR, description of academic changes, if any

Assessment Information

- Are the scores reflected on the chart percentages or numbers?  Percentages       Numbers
- What is the range of satisfactory, proficient, and unsatisfactory on the assessment used?
  - Unsatisfactory =
  - Satisfactory =
  - Proficient =

# Oklahoma City Public Schools

## *Private School Partnership*

### 2018-2019

## Private School Needs Assessment

#### Title IA

In an attempt to understand the needs of private schools that serve Title I students that reside in the Oklahoma City Public School District, this Needs Assessment document has been developed as a tool to be used to assist in program development that supports the delivery of equitable educational services, develops and implements accountability measures, and nurtures on-going consultation planning processes between the private school officials and the Oklahoma City Public School District representatives. *ESEA Section 1120*

#### Title IIA

Consistent with local planning requirement and its needs assessment, the Title II, Part A program will assist schools in aligning professional development activities with the needs of their students, principals and teaching staff. *Improving Teacher Quality State Grants Non-Regulatory Guidance*.



<b>School Name:</b>		<b>Principal Name:</b>	
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School participates in the following program(s):  Title IA  Title IIA

*Principal please complete this needs assessment with input from teachers.*

**TITLE IA SECTION**     Not Applicable – this school does not accept OKCPS Title IA funds.  
Please skip this section and complete the Title IIA Section.

**Free and Reduced Approved Applications (OKCPS District Addresses only)**

School Year	Total Enrollment within OKCPS District	Total Free Approved Applications (10-1-15)	Total Reduced Approved Applications (10-1-15)	# Students with Approved Applications Attending on Scholarship
2018-2019				

**Assessments for Students (OKCPS District Addresses only)**

School Year	Name of Assessment Used	# Students Pre-Tested	# Students Post-Tested
2017-2018			
2016-2017			
2015-2016			
2014-2015			

**Reading and Math Assessment Scores for Students (OKCPS District Addresses only)**

2018-2019 School Year	Assessment Score Range		
	# Student Scores Above Grade Level Performance	# Student Scores at Grade Level Performance	# Student Scores Below Grade Level Performance
Math Pre-Test			
Math Post-Test			
Reading Pre-Test			
Reading Post-Test			

**Parent Involvement Activities**

2018-2019 School Year Title IA Parent Involvement Events	Total Parent Attendance of Students within OKCPS District

**TITLE IIA SECTION**

**Not Applicable-this school does not accept OKCPS Title IIA funds.  
Please skip this section and complete the Title IA Section.**

**Professional Development**

*If pursuing an advanced degree or obtaining additional college hours, describe how the coursework will increase student achievement in your school.*

*Please prioritize the teacher training items listed below by numbering 1-5 with 1 being the highest priority, 2 second highest, etc.*

**Mathematics**

- \_\_\_ New methods of instruction
- \_\_\_ New content information (curriculum)
- \_\_\_ Increased knowledge of technology
- \_\_\_ Current trends in mathematics
- \_\_\_ Innovative programs

**Science**

- \_\_\_ New methods of instruction
- \_\_\_ New content information (curriculum)
- \_\_\_ Increased knowledge of technology
- \_\_\_ Current trends in science
- \_\_\_ Innovative programs

**Language Arts/Reading**

- \_\_\_ New methods of instruction
- \_\_\_ New content information (curriculum)
- \_\_\_ Increased knowledge of technology
- \_\_\_ Current trends in language arts/reading
- \_\_\_ Innovative programs

**Social Studies**

- \_\_\_ New methods of instruction
- \_\_\_ New content information (curriculum)
- \_\_\_ Increased knowledge of technology
- \_\_\_ Current trends in social studies
- \_\_\_ Innovative programs

**Fine Arts**

- \_\_\_ New methods of instruction
- \_\_\_ New content information (curriculum)
- \_\_\_ Increased knowledge of technology
- \_\_\_ Current trends in fine arts
- \_\_\_ Innovative programs

**Leadership Training (principals)**

- \_\_\_ School Culture and Climate
- \_\_\_ Closing the Achievement Gap
- \_\_\_ Mentoring/Coaching
- \_\_\_ Teacher Evaluations
- \_\_\_ Effective use of technology building wide