Schoolwide Services for Students That Attend Private Schools: A Policy Recommendation to the Every Student Succeeds Act

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SCHOOLWIDE TITLE SERVICES FOR STUDENTS THAT ATTEND PRIVATE SCHOOLS: A POLICY RECOMMENDATION TO THE EVERY STUDENT SUCCEEDS ACT

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Educational Leadership Doctoral Program

Submitted in partial fulfillment
of the requirements of
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Abstract
The Elementary and Secondary Education Act (ESEA) of 1965, reauthorized under the Every Student Succeeds Act (ESSA) of 2015, provides federal funding for equitable services to nonpublic school students, families and teachers. This act was signed by President Obama on December 10, 2015 and replaces No Child Left Behind (NCLB). As it relates to private schools, the reauthorization of ESEA mirrors NCLB in all areas but three: (1) set asides discontinued; (2) state appointed ombudsman; and (2) state as the provider of services. Upon reviewing the reauthorized law, I found an area that allows for inequitable services to students who attend private schools wherein excess of forty percent of the students come from low income families. My policy advocacy recommendation is grounded in this inequity and call for language in the law that eliminates this inequity.
Preface

There will be those who will question my audacity to recommend changing a policy that was just reauthorized on December 10, 2015. They will question, “Who does she think she is?” My response lies within my personal leadership statement: I will use my relentless drive to leverage change by whatever means necessary to create equitable opportunities.

Relentless drive refers to a steady and persistent vigorous energy towards an outcome which is often associated with transformational leaders, I have a “clear and compelling vision [which] is useful to guide change” (Yukl, 307). Peter Senge (2007) speaks of leveraging change as the bottom line of systems thinking in that one is identifying the actions and changes needed to make dramatic improvements. It involves taking a meaningful and honest look at where one is now versus where one wants to be and then engaging in purposeful actions to make the transition. This proposed policy recommendation does just that.

In 1964, while speaking at Oxford Malcolm X spoke of Hamlet’s quote “‘to be or not to be.’ Malcolm X stated “Hamlet was in doubt about something—whether it was nobler in the mind of man to suffer the slings and arrows of outrageous fortune—moderation—or to take up arms against a sea of troubles and by opposing, end them. And I go for that. If you take up arms, you’ll end it, but if you sit around and wait for the one who’s in power to make up his mind that he should end it, you’ll be waiting a long time.” Rather than waiting a long time and sitting passively, Malcolm X believed that the black man should use “any means necessary” to bring about justice. In light of the present achievement gaps (the civil rights issue of the 21st century), change must come “by whatever means necessary”.

The creation of equitable opportunities implies that equitable opportunities fail to exist presently. Evidence of inequitable opportunities include the achievement gaps; income gaps;
poverty rates; equitable services to privates school students, etc. Thus, there is a need to address inequitableness in education. Policy recommendations provide a means to address these inequities.

Bold and determined words communication my proposed policy recommendation. I am not without fear however. “[My] deepest fear is not that [I am] inadequate. [My} deepest fear is that [I am] powerful beyond measure. It is [my] light, not [my] darkness that most frightens [me]. [I] ask [myself], who am I to be brilliant, gorgeous, talented, fabulous? Actually, who [am I] not to be? [I am] a child of God. [Me] playing small does not serve the world. There is nothing enlightened about shrinking so that other people won't feel insecure around [me]. [I am] meant to shine, as children do. [I was] born to make manifest the glory of God that is within [me]. It's not just in [me]; it's in everyone. And as [I] let [my] own light shine, [I] unconsciously give other people permission to do the same. As [I am] liberated from [my] own fear, [my] presence automatically liberates others.” (Williamson, 190).
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Chapter 1: Vision Statement

Introduction

This policy paper evolved as a result of a policy analysis. Segal and Brzuzy (1998) speak of five policy analysis theories. “Rationalism policy making requires knowledge of the values of all segments of society, all possible policy alternatives, the consequences of those alternatives, and the costs and benefits” (p. 61). The problem is defined, alternatives are identified and evaluated and then the policy is implemented (Patton, 1993, p. 20). Incrementalism is offered as an alternative to rationalism in that based on this policy analysis theory, “there isn’t enough time to complete all the research nor there isn’t the availability of all information necessary to make an informed decision on all options in developing a new policy” (Segal & Brzuzy, 1998, p. 62). Therefore, policy comes as result of small recommendations. At times, there are social events that occur that create opportunities for change agents to present their ideas. This type of policy analysis theory is referred to as “window of opportunity” (p. 63). The “street level bureaucracy” policy analysis theory alters the intended policy recommendation when those who implement the policy become involved. Therefore, the original policy recommendation differs from that which is implemented (p. 63). Segal and Brzuzy offer a final policy analysis theory, implementation. Implementation of a policy evolves and policy changes as it is implemented (p. 64). The researcher aligned her work with the incrementalism policy analysis theory, offering a small change to the recently authorized ESEA referred to as Every Student Succeeds Act (ESSA).
Every Student Succeeds Act

The Elementary and Secondary Education Act (ESEA) of 1965, reauthorized under the Every Student Succeeds Act (ESSA) of 2015, provides federal funding for equitable services to nonpublic school students, families and teachers. This act was signed by President Obama on December 10, 2015 and replaces No Child Left Behind (NCLB). For the purposes of this research, I will address ESSA provisions for Title I, a federal program to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps” (ESSA, p. 8). More specifically, I will focus on Title I funding for private schools, cited in amended Part A, Subpart 1, Sections 1117 and Part F, Subpart 1, Section 8501.

Assurances.

Per Section 1117 of ESSA when a Local Education Agency (LEA) submits its application to the state for title find, that LEA must submit a written assurance from each private school official stating that “meaningful consultation” has occurred. That written assurance must provide a means for private school officials to communicate if “timely and meaningful consultation” did not occur or that the title program design is not such that it is “equitable” for private school students (p. 82). This same requirement in Section 8501 (p. 310).

Meaningful consultation.

Per Sectional 1117 of ESSA requires “timely and meaningful consultation” regarding the “design and development” of the title program for private school students, toward the goal of reaching an agreement. That “design and development includes identification of eligible students; what services will be provided; how, when, where and by whom the services will be provided. The LEA and private school officials must agree on how services will be assessed and
improved based on that assessment. Further discussion and agreement is required as it relates to the “size and scope” of services; how the proportion of funding is determined; and, the method for determining the number of students from low income families that attend private schools.

Prior to the LEA making any decision regarding service delivery, the views of private school officials must be considered. During this consultation process if the LEA disagrees with private school officials on service delivery, the LEA must communicate its rational for the disagreement in writing. The LEA and private school official must consult on whether the LEA will provide services or if a third party vendor will provide services. The results of the agreement must be forwarded to the ombudsman (p. 80-82). The same requirements are stated in Section 8501 (p. 421).

**Timing.**

Per Section 1117 of ESSA consultation between the LEA and private school official must occur prior to the LEA making any decision that will impact private student students’ participation in title programs. This consultation is ongoing, during the implementation of the program (p.82). The same requirements are stated in Section 8501 (p. 422).

**Equitable service and benefits.**

Per 1117 of ESSA title services for private school students must be equitable when compared to title services received by public school students. Such services must also be provided in a “timely manner. The LEA can determine the equitable share every year or every two years (p. 80-810). This requirement is also stated in Section 8501 (p. 420).

The expenditures for title services rendered to private school students must be “equal to the proportion of funds allocated to participating school attendance areas based on the number of children from low income families”. Under this reauthorization, LEA’s may not “set aside”
funding prior to determining the proportional share. Upon determining the allocation, the LEA must communicate it to private school officials in a timely manner. Funds must be obligated during the fiscal year that they were received (ESSA, Part A, Subpart 1, Section 1177, p. 80). These requirements are also stated in Section 8501 (p. 422.)

**Ombudsman.**

Per Section 1177 of ESSA states shall designate an ombudsman to ensure that equitable services are provided to private school officials as well as monitor the enforcement of the (p.79-80). This is a new provision that is also stated in Section 8501 (p. 420).

Should the LEA fail to meet the requirements under this law, private school official may request that the State educational agency provide title services. The state agency must provide services if private school officials demonstrate that the LEA has not met the requirements (p. 82). These requirements are also stated in Section 8501 (p. 422-423).

**Researcher’s Awareness**

I was the Regional Director of a for-profit educational corporation, one of the four vendors who responded to a large urban LEA’s Request for Proposals (RFP) and subsequently secured a contract with the LEA to provide title services. I became aware of this policy upon my employment with the for-profit corporation and I have reviewed the ESEA Act as well as federal and state guidance. I attended the LEA’s consultation meetings with private school officials throughout the 2015-2016 school year. I attended the vendor meetings that the LEA scheduled throughout the 2015-2016 school year. I attended an Equitable Services Institute at the University Of Notre Dame July 13th through July 16th, 2015 to learn more about equitable services for private school students.
Critical Issues

When I served as a district building principal and an independent charter school principal, students attending those schools received school wide title service. Section 114 of ESSA allows a LEA to use title funds to “upgrade” to a school wide program provided that forty percent of the children are from low income families. The schools that I led were schools wherein in excess of forty percent of the students came from low income families. The current law will not allow private schools to upgrade to a school wide program. Private schools wherein in excess of forty percent of the students are from low income families are limited to receiving targeted title services. Therefore, inasmuch as many of the private schools in this large urban city serve students wherein in excess of forty percent of the students come from low income families and are in need of title services, most students don’t receive title services. If these students transferred to their neighborhood district public school and in excess of forty percent of the students came from low income families, they would receive title services. By failing to offer school wide programs to private school students, a program available to public schools students, I question if “equitable services” are being provided.

Policy Recommendation

I recommend that private schools wherein forty percent or more of the students come from low income families receive schoolwide services rather than targeted services by amending Sections 1177 and 8501 of ESSA to provide language that supports this provision.

Effectiveness of the Policy in Meeting the Issue

“Policy advocacy is viewed as a concept arising naturally from an evolution of educational administration reform agenda” (Browder, 1995, p. 44). As an educational leader, I examined the “moral context” of how services are provided to private school students wherein
forty percent of the students come from low income families. The current law doesn’t allow schoolwide services for private school students. My policy change recommendation is a result of response to educational reform that brings to the forefront “a need for more thoughtful approaches to educational policy development” (Browder, 1995, p. 44). An approach that focuses on what “equitable services” may potentially be in private schools that serve students wherein in excess of forty percent of them come from low income families.

Summary

As it relates to private schools, the reauthorization of ESEA, referred to as the Every Student Achieves Act (ESSA), mirrors NCLB in all areas but three:

1. The LEA may no longer “set aside” revenue for “special projects” prior to determining private schools’ proportionate share.
2. A state appointed ombudsman is required to monitor and enforce the law.
3. Private schools may request that the State provide services if the LEA has failed to adhere to the requirements of the law.

When I began developing my policy recommendation in the summer of 2015, I was recommending one of the changes in the new law: the LEA may no longer “set aside” revenue. Since reviewing the new law, I propose a different policy recommendation. Private schools with in excess of forty percent of the student who come from low income families shall have the ability to offer schoolwide title programs.

In this chapter, I explored Sections 1177 and 3501 as applicable for private school students receiving title services and determined the need for a policy recommendation. In Chapter Two, I provide an educational, economic, social, political and moral/ethical analysis of the proposed policy. In Chapter Three, I present my advocated policy statement. In Chapter
Chapter 2: Analysis of Need

Introduction

Under Title I of the Elementary and Secondary Education Act (ESEA), local educational agencies (LEAs) are required to provide equitable services for eligible private school students. Students who qualify for title services are struggling academically and in need of services toward the goal of improving their educational outcomes to the level of their grade level peers. Title services is the means wherein students receive the additional instructional time, focused on their specific needs. Targeted services fail to provide services to all students who are eligible for title services. School wide services will provide title services to all students who are struggling academically and eligible for services by offering extended learning opportunities. In this chapter, I provide an educational, economic, social, political and moral/ethical analysis of the proposed policy.

Educational Analysis

“Our educational system was never designed to deliver the kind of results we now need to equip students for today’s world-and tomorrow’s” (Wagner, 2006, p. 29). I contend that while the Every Student Succeeds Act (ESSA) addresses some of the complexity of providing equitable services to students attending private schools, additional provisions are needed to close the gap between services received by students who attend private schools wherein in excess of forty percent of them come from low income families when compared to those who attend public schools wherein in excess of forty percent of them come from low income families. Schoolwide programs are a means of providing title services to more eligible student than targeted programs. The purpose of the Elementary and Secondary Education Act (ESEA) is “to provide all children significant opportunity to receive a fair, equitable, and high-quality education and to close the
achievement gaps” (ESSA, p, 8). Alston (2006) speaks of closing the achievement gap and recommends the following:

1. A classroom environment that supports teaching and learning
2. Use of research based instructional strategies and address the needs of diverse learners
3. Use of assessment data to drive instructional decision making
4. Targeted reading and math instruction
5. Instructional time that is protected and safeguarded

ESSA speaks of closing the achievement gaps for all students, those attending public schools as well as private schools.

**Economic Analysis**

Wagner speaks of a “knowledge economy, a [transition] from one in which most people earned their living with skilled hands to one in which all employees need to be intellectually skilled” (2006, p. 30). This knowledge economy requires schools to produce students who are college and career ready. New skills are required of our students to prepare them for the workplace, skills that correspond with those needed for success in college. A college education may not be required for students to compete in this knowledge economy; however, employers expect that employees have skill similar to those who attend collect (Wagner, 2006, p. 31).

**Social Analysis**

Society expects that students demonstrate self-control and respect for authority. “Today’s young people are growing up with a different relationship to authority and self-control” (Wagner, 2006, p. 33). Doster and Fears (2015) speak of the benefits of an after school program, an option for schoolwide title programs, that not only improves academic achievement but also increase prosocial values and behaviors (p. 26). Davies and Peltz contend that afterschool
programs can serve as “a venue for adults to model socially acceptable behaviors in real-life situations” (p. 13).

**Political Analysis**

When considering policy changes, previous reauthorization of the Elementary and Secondary Education Act focused on high stakes testing and other “punitive overtones” as Wagner states (2006, p. 35). The new reauthorization of ESEA makes changes in other areas that are more incremental and reform driven. As shared at the Equitable Services Institute in June 2015, the Archdiocese lobbied for changes in the ESEA as it relates to equitable services for private schools. They were successful in that the new law eliminated LEA’s ability to “set aside” revenue prior to determining private schools’ proportion of funding. My advocated policy recommendation is equally politically charged in that it creates an environment which further exasperates competition amongst public, charter and private schools for scarce resources, revenue.

**Moral and Ethical Analysis**

This advocated policy recommendation is based on the need to ensure that students attending private school receive equitable services per the law. Therefore, a moral dilemma surfaces when services are provided in an inequitable manner based on whether a student receives title services in a private school when compared to students that receive services in a public school. Parents of student that attend private schools pay taxes, the same tax revenue that support public education and the same revenue that support federal grants such as that of ESEA. It is unethical to expect parents to pay those taxes and fail to provide them with services that are afforded to public school students.
Summary

In this chapter, I provided an educational, economic, social, political and moral/ethical analysis of my advocated policy recommendation. That analysis provided clarity to the reader about the need for this policy. In Chapter Three, I present my advocated policy statement. In Chapter Four, I present my advocated policy argument. In Chapter Five, I present my policy implementation plan. In Chapter Six, I present my policy assessment plan. In Chapter Seven, I present my summary impact statement.
Chapter 3: Advocated Policy Recommendation Statement

Introduction

Having analyzed the advocated policy recommendation in Chapter Two, I provide clarity regarding what is proposed as well it the goals and objectives in this chapter. The population for which this policy represents is articulated as well as the basis for its validation.

Goals and Objectives

The goal of this policy is to ensure that students who attend private schools wherein in excess of forty percent of the students come from low income families have access to schoolwide services in an equitable manner as students who attend public schools wherein in excess of forty percent of the students come from low income families. The objective of this policy is to align Sections 1177 and 3501 with the purpose of the Elementary and Secondary Education Act “to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps (ESSA, p. 8) by including language in those sections regarding expanding title programs from targeted to schoolwide at private schools that meet the same requirements under Part A, Subpart 1, Section 114.

Population Represented

This advocated policy recommendation is intended to expand targeted title services to schoolwide services for students who attend private schools wherein in excess of forty percent of the students come from low income families. This is a population of students whom otherwise would receive schoolwide title services if they were attending public schools.
**Basis for Validation**

Per 1117 of ESSA title services for private school students must be equitable when compared to title services received by public school students (p. 420). The new provision of ESSA that eliminates a LEA’s ability to “set aside” up to forty percent of title revenue prior to establishing proportional amounts for the private schools was the first step toward eroding inequity. I contends that adding language in the current law regarding school wide title services for high poverty private schools advances ESEA toward a higher level of equity for private school students.

**Summary**

In this chapter, I provided clarity regarding my proposed advocacy policy. Chapter Four, I present my advocated policy argument. In Chapter Five, I present my policy implementation plan. In Chapter Six, I present my policy assessment plan. In Chapter Seven, I present my summary impact statement.
Chapter 4: Policy Recommendation Argument

Introduction

In this chapter, I will present my policy recommendation argument. School funding and the allocation of revenue is a politically charged issue. With scarce resources, public, charter and private schools compete to receive funding to provide much needed educational services. This policy recommendation argument centers on funding that supports equitable services in private schools and changes to the Elementary and Secondary Education Act.

“Set Asides”

A new provision of the recently reauthorized Elementary and Secondary Education Act, referred to as Every Student Succeeds Act, eliminated the ability of LEA’s to “set aside” funding prior to determining proportionality. At the Equitable Services Institute that was held in July 2015, data was obtained from five school districts’ consolidated application or the 2013-2014 school year. Table 17 provided amounts of revenue that had been set aside by these districts prior to determining private schools’ proportionality and how much of that set aside was funded by private school students.

Table 1

Amount of Title Revenue Set Aside by Five Large School Districts

<table>
<thead>
<tr>
<th>District</th>
<th>Set Aside minus Private School Allocation</th>
<th>Percentage of Private School Low Income Students</th>
<th>Private School Allocation</th>
<th>Amount of Set Aside Funded by Private Schools</th>
<th>Percentage Loss to Private Schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allentown City, PA</td>
<td>$5,236,066</td>
<td>4.14%</td>
<td>$129,235</td>
<td>$216,773</td>
<td>62.65%</td>
</tr>
<tr>
<td>Miami-Dade, FL</td>
<td>$68,444,599</td>
<td>6.23%</td>
<td>$2,736,978</td>
<td>$4,264,099</td>
<td>60.91%</td>
</tr>
<tr>
<td>Pittsburg, PA</td>
<td>$10,145,339</td>
<td>6.8%</td>
<td>$528,555</td>
<td>$689,883</td>
<td>56.62%</td>
</tr>
<tr>
<td>Milwaukee, WI</td>
<td>$41,947,037</td>
<td>26%</td>
<td>$10,450,389</td>
<td>$10,906,229</td>
<td>51.07%</td>
</tr>
<tr>
<td>San Francisco, CA</td>
<td>$4,417,227</td>
<td>5.17%</td>
<td>$229,254</td>
<td>$228,371</td>
<td>49.90%</td>
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<td></td>
<td>$130,190,268</td>
<td></td>
<td>$14,074,411</td>
<td>$16,305,355</td>
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</tr>
</tbody>
</table>
In four of the five districts, private school allocations were less than the amount of set aside that were funded by private school. The revenue that was previously “set aside” by the LEA can be used to fund schoolwide programs in private schools wherein in excess of forty percent of the students come from low income families. Unfortunately for LEA’s who used “set asides” for district wide initiatives, such as small class size, high school redesign, etc., they must find other sources of revenue to fund those initiatives.

Summary

With the reauthorization of ESEA and elimination of LEA’s ability to “set aside” revenue, there exists additional funding that was provided to public schools that should have been allocated to private schools. My advocated policy recommendation provides means to address the inequity as a result of that practice and one way to increase future equity in service provision for students who attend private schools where in excess of forty percent of the students come from low income families.

In this chapter, I presented my policy recommendation argument. In Chapter Five, I present my policy implementation plan. In Chapter Six, I present my policy assessment plan. In Chapter Seven, I present my summary impact statement.
Chapter 5: Implementation Plan

Introduction

LEA’s shall allow private schools to “upgrade” to a schoolwide program provided that in excess of forty percent of the student attending that private school come from low income families in a manner equitable with that which Section 114 of ESSA allows LEA’s to do for public schools. Language regarding this provision shall be inserted into Sections 1177 and 3501 of ESSA. In this chapter, I provide an implementation plan for my advocated policy recommendation.

Comprehensive Title Plan

Private school officials wherein in excess of forty percent of the students come from low income families will submit a Comprehensive Title Plan to the LEA that is developed in collaboration with private school teachers, paraprofessionals, school leaders, parents, students and community leaders based on a comprehensive needs assessment similar to that which is required in Part A, Subpart I, Section 1114 of the ESSA. The needs assessment will include the following:

1. Academic achievement of all private school student, particularly those who or failing or at risk of failing, based on nationally normed assessment data
2. Strategies that will be to address the needs of students who are failing or at risk of failing that will also benefit all students schoolwide, inclusive of research based methods and instructional strategies
3. How, when and where services will be provided
4. Annual SMART goal for schoolwide improvement
5. Professional development plan for teachers, paraprofessionals and school leaders
6. Parental involvement plan for training parents

7. Budget of how the private school will utilize its allocation for equitable services

This plan shall be updated during the implementation of the title plan during the fiscal year that expenditures are obligated. I have provided a suggested Comprehensive Title Plan (See Appendix A). This plan was based on a sample Needs Assessment and Program Development Plan distributed at the Equitable Services Institute in July 2015.

Timeline

All other provisions related to equitable services for students attending private schools and provided in Sections 1177 and 3501 shall be adhered to by the private school officials and the LEA. To ensure that meaningful consultation occurs as it relates to equitable services for private school offering school wide program, I have provided a suggested timeline for planning of schoolwide programs in private schools wherein in excess of forty percent of the students come from low income families (Appendix B). Such Comprehensive Title Plan shall be submitted to the LEA by March for the next fiscal year. The suggested timeline is based on a tool that can be found in the US Department of Education’s Ensuring Equitable Services Toolkit (2006).

Summary

I assume that private school leaders develop annual plans similar to that proposed. However, I propose that private school officials who lack experience in developing a Comprehensive Needs Assessment engage in professional development. I suggest that the LEA consults with private school wishing to offer school wide programs in February, providing direction on the completion of the Comprehensive Title Plan. In this chapter, I presented my implementation plan for the proposed advocacy policy. In Chapter Six, I present my policy assessment plan. In Chapter Seven, I presents my summary impact statement.
Chapter 6: Policy Recommendation Assessment Plan

Introduction

Per Sectional 1117 of ESSA the LEA and private school officials must agree on how services will be assessed (p. 80). This requirement is also provided in Section 8501 (p. 421). Additionally, the proposed Combined Title Plan provides private schools with an opportunity to develop a SMART goal and the means by which they will assess the progress towards meeting that goal. In this chapter, I will elaborate on another of assessing the proposed advocacy policy recommendation.

Nationally Normed Assessment

All public elementary and secondary students are required to be assessed using their respective state’s assessment system per ESSA (p. 24). However, private school students are not required to take state assessments under ESSA. A private school may choose to assess its student using the state assessment as a means of determining student academic progress per its Combined Title Plan. A private school may assess students using a national normed assessment to determine if schoolwide title services positively impacted student achievement. Such private school may utilize the same nationally normed assessment identified during the consultation progress with the LEA per ESSA.

Summary

The LEA and private school officials consult to agree upon how private school students receiving equitable services will be assessed. The means for assessing private schools students shall be the means for assessing this proposed advocacy policy recommendation. In Chapter Seven, I will presents her summary impact statement.
Chapter 7: Summary Impact Statement

Having served in various capacities in district, charter and nonpublic schools; I am “pro student”. As a parent who raised two children functioning on opposite ends of the intellectual spectrum, one gifted and talented and one with a severe cognitive disability, I made choices about where my children received their education based on their individual needs. My son, with a severe cognitive disability, attended a public school in a large urban city. My daughter, who is gifted and talented, attended a private school near the suburbs of the large urban city. I was “pro student” for my children, ensuring that they received an education tailored to their needs. An education that maximized available funding and provided opportunities for my children to maximize their potential. Thus it is only natural for me to advocate for a policy that continues to afford other students that same opportunity, particularly students who attend private schools wherein in excess of forty percent come from low income families. This “pro student” stance is the basis for this advocated policy recommendation.
References


Wisconsin Department of Public Instruction (2013). *ESEA Information Update: Bulletin 03.01*.

Appendix A: Comprehensive Title Plan

[insert year] School Year

School:
Address:
Enrollment:
Percentage of Students from Low Income Families:
Private School Official/Primary Contact:
   Phone Number:
   E-mail Address:

Needs Assessment:
Academic achievement of all private school student, particularly those who or failing or at risk of failing, based on nationally normed assessment data. Include appropriate data for support.

Programs and Services:
Describe the program, services or other activities you would like the school district to implement to address these identified needs, including how, when and where services will be provided. To the extent possible, include estimated cost of programs and services.

Strategies that will be to address the needs of students who are failing or at risk of failing that will also benefit all students schoolwide, inclusive of research based methods and instructional strategies

Professional development plan for teachers, paraprofessionals and school leaders:
Identify your teachers’ professional development needs as related to improving your students’ academic achievement. To the extent possible, include estimated cost of programs and services.

**Parental involvement plan for training parents:**
Identify the training needs of your parents as it relates to improving your students’ academic achievement. To the extent possible, include estimated cost of programs and services.

**Goal Setting:**
Write an annual SMART goal for your identified need and planned activities. (EXAMPLE: For an identified need of reading, “By May 2009, students participating in planned activities will increase their reading scores by ______%”. For an identified need to enhance instruction in differentiated learning, “All teachers participating in the professional development will include differentiated learning practices in their daily instruction.”)

**Evaluation Plan:** Describe the formalized plan for determining the extent to which the goals were achieved.

**Student Achievement:**

**Professional Development:**

**Parent Training:**

**Private School Official:** _________________________________

**Date:** _________________________________

*Please complete and submit this Combined Title Plan by [insert date] and email/send to: [Insert LEA contact and address, including phone number]*
## Appendix B: Timeline for Schoolwide Programs in Private Schools

<table>
<thead>
<tr>
<th>Month</th>
<th>LEA Action</th>
<th>Private School Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>November/December in preparation for the next school year</td>
<td>Meet with private school officials to review timeline and consultation process. Provide training on how to completed the Combined Title Plan</td>
<td>Notify LEA of intent to offer a schoolwide program. Begin developing Combined Title Plan</td>
</tr>
<tr>
<td>December through February in preparation for the next school year</td>
<td>Estimate the private school’s allocation using the same estimated per-pupil amount as that used for public school students in participating public school attendance areas.</td>
<td>Complete Combined Title Plan</td>
</tr>
<tr>
<td>March in preparation for the next school year</td>
<td>Review submitted Combined Title Plans. Meet with private school officials to agree upon terms of the School wide Plan</td>
<td>Submit Combined Title Plan</td>
</tr>
</tbody>
</table>