U.S. DEPARTMENT OF EDUCATION



Private School Participants in Federal Programs
Under the *No Child Left Behind* Act and the
Individuals with Disabilities Education Act:
Private School and Public School District Perspectives



Private School Participants in Programs under the No Child Left Behind Act and the Individuals with Disabilities Education Act: Private School and Public School District Perspectives

U.S. Department of Education Office of Planning, Evaluation and Policy Development, Policy and Program Studies Service

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While we appreciate the assistance and support of all of those who helped with the report and surveys, any errors are, of course, our own.



Executive Summary

Background

Public school districts are required to provide equitable services to eligible private school students through the *Elementary and Secondary Education Act (ESEA)*, as reauthorized by the *No Child Left Behind Act of 2001 (NCLB)*, and the *Individuals with Disabilities Education Act (IDEA)*, reauthorized in 2004. Twelve major *ESEA* programs require public school districts to provide services and benefits to private school participants on an equitable basis. *IDEA* requires that public school districts conduct a child find process to locate students with disabilities enrolled by their parents in private schools, and to expend a proportionate amount of funding on special education and related services to such eligible children enrolled in private schools.

Both *ESEA* and *IDEA* also require that public school districts engage in timely and meaningful consultation with private schools about the provision of services to private school students and their teachers and parents. This consultation must occur before any decision is made that impacts the opportunities for participation of private school students, teachers, and parents and throughout the design, development, implementation, and assessment of those services. ¹

This report describes participation of private school participants in federal education programs, the consultation process between private schools and public school districts, and public school district allocation of federal funds for services for private school participants. The results presented in this report are based on surveys conducted in 2005–06 among a nationally representative sample of public school districts with at least one private school located within their boundaries and a nationally representative sample of private schools located within the geographic boundaries of the sample districts.

Report findings

The study resulted in four key findings:

- Less than half of private schools reported having at least one participant (students, teachers, or parents) in an *ESEA* program, though Catholic schools were more likely than other private schools to have at least one participant in an *ESEA* program (80 percent).
- Forty percent of private schools with no *ESEA* participants reported not participating in *ESEA* programs because they had no knowledge of these programs.
- Public school districts and private schools with participants in a particular *ESEA* program generally reported similar levels of consultation about that *ESEA* program.

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¹ ESEA, Section 9501(c)(3), Section 1120, (b)(2) and IDEA Section 612(a)(10)(A)(iii).

• Less than half (43 percent) of private schools had at least one participant in *IDEA*; 38 percent of private schools reported that the public school district engaged in timely and meaningful consultation with private school officials, representatives, or parents regarding participation in *IDEA*, while 86 percent of public school districts reported conducting such consultations with appropriate parties. *IDEA* does not require public school districts to consult with all private schools but rather with private school representatives and representatives of parents of parentally placed students with disabilities attending private schools located in the district. However, the public school district may consult with a representative of the private school and the private school may be unaware of the consultation.

Participation

Overall, 44 percent of private schools had at least one participant in an *ESEA* program. However, there was not a single individual *ESEA* program (e.g. Title I, Part A) in which more than 20 percent of private schools had at least one participant. The two *ESEA* programs with the highest levels of participation were State Grants for Innovative Programs (20 percent) and Improving Teacher Quality State Grants (20 percent). Sixteen percent of private schools had participants in Improving Basic Programs Operated by Local Education Agencies (Title I, Part A), the largest *ESEA* program.

Exhibit E-1
Total Private School Students Participating in Title I, Part A, 1979–2004

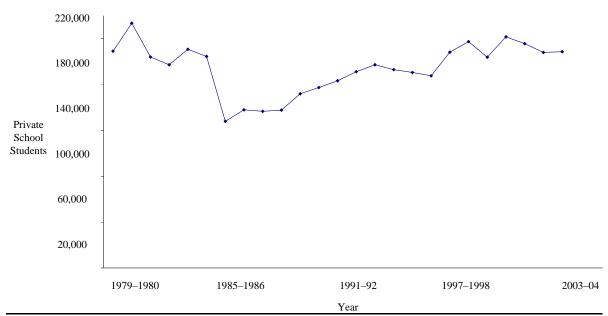


Exhibit Reads: More than 180,000 private school students participated in Title I, Part A, programs in 1979–80. Source: Consolidated State Performance Reports. See Exhibit A-1 for more detailed data.

Title I, Part A, is the only federal program where data are available on the participation of private school students over time. In the 2003–04 school year, there were more than 188,000 private school students nationwide participating in Title I, Part A. This represented 3 percent of the

entire private school population and 1 percent of all Title I, Part A, participants. The number of private school students participating in Title I has increased gradually over the years, although it remains below the high of 213,500 reached in 1980–81 (See Exhibit E-1).²

Catholic schools were more likely to report having at least one participant in *ESEA* programs than were non-Catholic schools. Eighty percent of Catholic schools reported having a participant in at least one of the 11 *ESEA* programs covered in this study, compared with one-quarter of non-Catholic schools. More than one-third (37 percent) of Catholic schools reported having participants in Title I, Part A, compared with 7 percent of other religious private schools and 6 percent of nonsectarian schools.

The percentage of students participating in a particular *ESEA* program in a given private school varied substantially by the religious affiliation and size of the school. While nonsectarian schools were less likely than Catholic schools to have participants in *ESEA* programs, those that did have participants were likely to have a majority of their students participating in four out of the five programs in which private schools most often reported having participants. Among private schools with at least one participant in *ESEA* programs, the smaller schools (those with fewer than 100 students) tended to have a higher fraction of students participating in most of the *ESEA* programs.

The most common reason given by private schools for not having participants in *ESEA* programs was a conscious decision not to be involved in federal programs (58 percent). Forty percent of private schools with no *ESEA* participants reported having no knowledge of federal education programs under *ESEA*. However, 14 percent of the private schools that reported no knowledge of *ESEA* programs (6 percent of private schools with no *ESEA* participants) also reported that they consciously chose not to participate.

IDEA had the highest percentage of private schools with participants of any federal education program. Forty-three percent of private schools had at least one participant in *IDEA*.

Provision of Services

The vast majority of public school districts containing at least one private school within their boundaries reported providing no services to private school students under the following *ESEA* programs; English Language Acquisition (85 percent); 21st-Century Community Learning Centers (93 percent); Reading First (96 percent); Even Start (97 percent); Mathematics and Science Partnerships (98 percent); and Migrant Education (98 percent). However, these figures do not take into account whether public school districts received federal funds for these programs or had eligible private school students within district boundaries.

Private schools reported that the most common services provided through *ESEA* programs were professional development for private school teachers and the provision of equipment and materials. Forty-five percent of public school districts offered Title I, Part A, services to

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² The precipitous drop in participation in the 1985–86 school year was a consequence of the Supreme Court's decision in *Aguilar v. Felton* in 1985.

private school participants, with the majority indicating that a public school district employee provided these program services at the private school site.

For *IDEA*, the most common services that public school districts provided were speech and language therapy (92 percent) and special education instruction (78 percent).

Consultation

Public school districts and private schools with participants in a particular program generally reported similar levels of consultation about that *ESEA* program.

Limited communication from the public school district was the most common reason private schools gave for the absence of timely and meaningful consultation. Seven percent of public school districts identified poor coordination within the public school district office as a barrier to timely and meaningful consultation.

ESEA introduced new consultation requirements for Title I, Part A. In addition to already existing requirements, consultation must include discussion of student assessment, professional development, and activities for parents. Both public school districts and private schools reported that, in general, these new Title I, Part A, consultation topic requirements were less likely to be discussed than the long-standing requirements. For example, only 52 percent of public school districts and 41 percent of private schools reported discussing 'activities for parents,' one of the new required consultation topics, compared to long-standing required topics such as 'types of services' (81 percent of public school districts and 83 percent of private schools) and 'number of students generating funds' (80 percent of public school districts and 73 percent of private schools).

For *IDEA*, 38 percent of private schools reported that the public school district engaged in timely and meaningful consultation with private school officials, representatives, or parents regarding participation in *IDEA*, while 86 percent of public school districts reported conducting such consultations with appropriate parties. One possible explanation is that public school districts are required to consult with some, but not all, private schools located within their boundaries. Additionally, public school districts may consult with an organization like a diocese on behalf of a group of private schools.

Conclusion

A majority of private schools did not have participants in federal education programs and chose not to participate. Catholic schools, however, had much higher rates of participation among their students, teachers, and parents than did other types of private schools. A number of private schools reported lacking information about federal education programs and poor communication from public school districts. The lack of information and communication likely contributed to lower participation and reflects an opportunity to improve participation rates. Public school districts, in contrast, generally reported making an effort to involve private school participants. Regardless, it appears there may still be work to be done to achieve equitable participation in federal education programs for private school students, teachers, and parents, and to better educate the private school community on federal education benefits.

1. Introduction

More than five million students attend more than 28,000 private elementary and secondary schools in the United States, representing more than 10 percent of all K–12 students in the United States. Catholic schools make up 28 percent of those private schools; other religious schools represent approximately half of all private schools. However, 46 percent of private school students attend Catholic schools, while 36 percent of private school students attend other religious schools and 18 percent of private school students attend private schools with no religious affiliation. Three-quarters of the nation's private schools are located in cities and suburbs.³

This report describes the participation patterns of private school participants in federal education programs. It also examines the consultation process between private schools and public school districts regarding program eligibility and service provisions per *ESEA* and *IDEA* requirements. Additionally, it explores public school district allocation of federal funds for services to private school participants. The results presented in this report are based on surveys conducted in the fall and winter of the 2005–06 school year to a nationally representative sample of public school districts with at least one private school located within their geographic boundaries and a nationally representative sample of private schools geographically located within those public school districts.

Private School Students and the *Elementary and Secondary Education Act (ESEA)*

The federal government has provided for the participation of private school students in education programs since 1965, when the *Elementary and Secondary Education Act* (*ESEA*) was originally enacted. *ESEA* included provisions requiring public school districts to provide equitable services to eligible private school students under certain programs. Under these programs, federal funds were *not* provided directly to private schools but were to be used to provide services to eligible students who were enrolled in private schools, as well as to their teachers and parents (see *ESEA*, Section 1120, Section 5142, and Section 9501).

Since the passage of *ESEA*, two Supreme Court decisions have substantively changed the landscape in which private school students receive equitable services. First, in 1985, the Supreme Court ruled in *Aguilar v. Felton* that Title I instructional services could not be provided to private school students in religiously affiliated private schools. Because Title I, Part A, is one of the largest federal education programs and most private schools are religiously affiliated, the *Aguilar* decision led to a substantial decline in the number of private school students receiving Title I education services. This trend began to reverse as public school districts purchased

From the 2003-2004 Private School Universe Survey (NCES 2006-319). Washington, D.C.: U.S. Department of Education, National Center for Educational Statistics.

³ Stephen P. Broughman and Nancy L. Swaim, *Characteristics of Private Schools in the United States: Results*

mobile vans and other forms of capital to facilitate the legal instruction of eligible private school students.⁴

In 1997, the Supreme Court overturned the *Aguilar* decision in *Agostini v. Felton*. This ruling provided increased flexibility to public school districts in the provision of federal education services to private school students, allowing them to deliver services on site at the students' private schools. Currently, public school districts may provide services to private school students at a public school, at a private school regardless of religious affiliation, or at a neutral location. Specifically, the *Agostini* decision found that public school personnel could provide Title I services in private religious schools without violating the Establishment Clause of the First Amendment to the U.S. Constitution (which prohibits the establishment of a state religion), provided certain safeguards are in place to prevent excessive entanglement between church and state.

In 1994, the *Improving America's Schools Act (IASA)* reauthorized *ESEA* and made two notable changes. First, Title I distributed funds based on the number of poor children and not academic achievement scores. Second, *IASA* included Uniform Provisions for the participation of private school students and teachers, and strengthened the language requiring consultation between private school and public school district officials, stating that the consultation must be timely and meaningful.

In 2002, the reauthorization of *ESEA* through the *No Child Left Behind Act (NCLB)* left the private school provisions of *IASA* largely intact. Under Title I, the consultation requirements were strengthened, adding a requirement that public school districts maintain a written affirmation of consultation signed by an official of each participating private school. A requirement that services provided to private school students and teachers be made in a "timely manner" was added and the list of programs requiring equitable participation under the Title IX uniform provision was expanded.

Provision for equitable participation of private school students is required in 12 major programs (See Exhibit 1). Nine of the twelve programs are governed by the Title IX Uniform Provisions, which require that public school districts and other grantees provide services and benefits for private school students and teachers that are comparable to those received by their public school counterparts. These services must be proportionate with the number of eligible students attending private schools in the public school district jurisdiction. Public school districts must spend an equal amount of funds per eligible private school student, offer private school students and teachers activities equivalent to those available to public school participants, and ensure that the services and programs provided remain secular, neutral, and nonideological.

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⁴ Rubenstein, Michael G., Keith S. Gayler, and Bruce M. Haslam (1998). *Title I Services for Private School Students Under the Reauthorization of ESEA: A Snapshot of Federal Assistance in Transition*. Washington, D.C.: U.S. Department of Education, Office of the Under Secretary.

⁵ State legal prohibitions limit services for students in religiously affiliated private schools in some states. *NCLB* allows for the option of a bypass in these states, or in states or public school districts that substantially fails to provide the required services, through the use of third-party contractors that meet the requirements of federal statutes.

Furthermore, public school districts receiving money under *ESEA* programs governed by the Uniform Provisions must consult with the private schools in a timely and meaningful fashion on the following topics:

- 1. How children's needs will be identified;
- 2. What services will be offered;
- 3. How, where, and by whom the services will be provided;
- 4. How the services will be assessed, and how the results of those assessments will be used to improve the program;
- 5. The size and scope of equitable services and the amount of available funds;
- 6. How and when the public school district will make decisions regarding provision of services (including who will receive them and who will provide them); and⁶
- 7. A thorough discussion of the views of private school officials on the provision of contract services through potential third-party providers.

This consultation must occur both before any decision is made that impacts the participation of private school students and teachers and throughout the design, development, implementation, and assessment of those services.⁷

There are three ESEA programs requiring equitable participation that are not subject to the Title IX Uniform Provisions: Title I, Part A; State Grants for Innovative Programs; and Javits Gifted and Talented Education. Each have individual provisions governing the equitable participation of private school students, and these requirements differ slightly from the Title IX Uniform Provisions. In Title I, Part A, in addition to providing equitable services and benefits to eligible private school students, public school districts are also required to provide equitable services to the parents and teachers of those students, consult in a timely and meaningful way with private schools on a number of specific topics, and obtain written affirmation from private schools that such consultation has taken place. Equitable participation stipulations in State Grants for Innovative Programs require that public school districts provide secular and neutral services to private school students and their teachers, in consultation with private school officials. Expenditures for services for private school students must be consistent with the number of students enrolled in private schools within the public school districts' boundaries. For Javits Gifted and Talented Education, the secretary of education grants funding for specific programs benefiting gifted and talented students. As a result, the secretary is held responsible for ensuring equitable participation of both students and teachers in private schools during the grant-making process. In the past few years, the number of grants through Javits Gifted and Talented Education has been quite small. For this reason, the program was not included in this report.

⁷ ESEA, Section 9501(c) (3).

⁶ ESEA, Section 9501(c).

⁸ For further details on these requirements, see *ESEA*, Section 1120.

⁹ ESEA, Section 5142.

Exhibit 1 Overview of *ESEA* **Programs Eligible for Private School Student Participation**

Program	Brief Description	2007
	•	Appropriation
		(in millions)
Improving Basic	Provides funds to states and public school districts with high percentages of	\$12,838.1
Programs	low-income students to help ensure that all students are capable of meeting	
Operated by LEAs	challenging academic achievement standards.	
(Title I, Part A)		
Reading First	Provides funding to promote reading skills for grades K–3 by providing	\$1,029.2
(Title I, Part B,	additional resources, including materials, professional development,	
Subpart 1)	diagnostics, and assessments.	
Even Start	Promotes educational opportunities for low-income families. Priorities	\$82.3
(Title I, Part B,	include adult literacy, parenting education, and early childhood education.	
Subpart 3)		
Migrant	Focuses on meeting the educational needs of migrant students, including	\$386.5
Education	minimizing disruption related to moves and overcoming cultural, language,	
(Title I, Part C)	and social barriers.	
Improving	Seeks to improve academic achievement by increasing the number of	\$2,887.4
Teacher Quality	highly qualified teachers and administrators.	
State Grants		
(Title II, Part A)		
Mathematics and	Supports partnerships between state education agencies, local education	\$182.2
Science	agencies, institutions of higher education, and schools designed to improve	
Partnerships	students' academic achievement in mathematics and science.	
(Title II, Part B)		
Educational	Seeks to improve academic achievement through the use of technology in	\$272.3
Technology State	elementary and secondary schools through a variety of means, including	
Grants	initiatives to improve access to technology, the development of technology	
(Title II, Part D)	infrastructure, and professional development in the area of technology.	
English Language	Helps Limited English Proficiency (LEP) students reach English language	\$669.0
Acquisition	proficiency to improve their overall academic performance. Can be used to	
(Title III, Part A)	provide language training to both students and teachers.	
Safe and Drug-	Funds programs to ensure safe and drug-free school environments.	\$346.5
Free Schools and	Activities supported include professional development; conflict resolution;	
Communities	drug, violence, and suicide prevention; character education; and counseling.	
State Grants		
(Title IV, Part A)		
21st-Century	Supports summer, before-school, and after-school services for students and	\$981.2
Community	families from low performing schools.	
Learning Centers		
(Title IV, Part B)		
State Grants for	Promotes innovative programs in teaching and learning. Funds can be used	\$99.0
Innovative	for professional development, library materials, educational equipment,	
Programs	computer software, mental health services, and parent or community	
(Title V, Part A)	involvement programs.	

Title I

This report provides a particularly in-depth examination of Title I, Part A, which is the largest federal education program and also has special requirements related to private school participants. As a consequence, the participation of private school students, teachers, and parents

receiving Title I, Part A, services and the specific requirements of the program are given special attention in this report.

Title I, Part A, is the only federal program in which data are available on the participation of private school students over time. In the 2003–04 school year, there were over 188,000 private school students nationwide participating in Title I, Part A. This represented 3 percent of the entire private school population and 1 percent of all Title I, Part A, participants. The number of private school students participating in Title I has increased gradually over the years, although it remains below the high of 213,500 reached in 1980–81 (See Exhibit 2). 10

220,000

180,000

Private
School
Students
100,000

20,000

1979–1980
1985–1986
1991–92
1997–1998
2003–04
Year

Exhibit 2
Total Private School Students Participating in Title I, Part A, 1979–2004

Exhibit Reads: More than 180,000 private school students participated in Title I, Part A, programs in 1979–80. Source: Consolidated State Performance Reports. See Exhibit A-1 for more detailed data.

"Parentally Placed" Private School Students and the *Individuals with Disabilities Education* Act (IDEA)

The *Individuals with Disabilities Education Act (IDEA)* requires equitable provision of services for children with disabilities enrolled by their parents in private schools. In 1975, Congress passed the *Education For All Handicapped Children Act*. It required that students with disabilities "receive special education and related services specially designed to meet their needs." The goal of this act was to provide students with disabilities a free and appropriate public education (FAPE). In 1990, the act was reauthorized as *IDEA*.

¹¹ Sandra J. Altshuler and Sandra Kopels, "Advocating in Private Schools for Children With Disabilities: What's New With IDEA?" *Social Work*, July 2003, Vol. 48, Issue 3, pp. 320-329.

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¹⁰ The precipitous drop in participation in the 1985–86 school year was a consequence of the Supreme Court's decision in *Aguilar v. Felton* in 1985.

The 2004 *IDEA* legislation assigned distinct responsibilities related to consultation and funding to public school districts. After consulting with private school officials and parent representatives, public school districts must conduct a child find process similar to the activities undertaken for the agency's public school district children to ensure equitable participation for eligible students attending private schools located in the public school district's jurisdiction, regardless of the child's residence.¹²

In addition, the public school district must spend a proportionate amount of federal funds for special education and related services for children with disabilities enrolled in private schools by their parents.¹³ This amount is based on the counts of eligible children with disabilities produced through the child find process.

The public school districts have a responsibility to provide equitable services for parentally placed private school students with disabilities as a group. No parentally placed private school child with a disability has an individual right to receive some or all of the special education and related services that the child would receive if enrolled in a public school. After timely and meaningful consultation has occurred, the public school districts expend a proportionate share of federal *IDEA* funds on special education and related services for such children. The 2004 reauthorization of *IDEA* strengthened consultation requirements stating that public school districts must engage in timely and meaningful consultation with private school representatives and representatives of parents of parentally placed students during the design and development of special education programs. In addition, public school districts must obtain written affirmation from private school representatives that timely and meaningful consultation has taken place.

Research Background and Evaluation Questions

Both *ESEA* and *IDEA* require that public school districts provide benefits and services associated with federal education programs to private school students and other eligible participants (i.e., teachers and parents). Public school districts have some flexibility in deciding where and how services will be provided to students.

The Department of Education conducted a study in 1998 focused solely on Title I, Part A, services. The report found that "despite generally positive assessments of the working relationships between Title I administrators and staff and private school representatives, there are significant differences in their reports about who is involved in consultation and about the topics that are discussed."

¹² While the 2004 *IDEA* legislation placed the responsibility of child find and the provision of services on the public school district where the private school is located, previous *IDEA* legislation generally required the public school district where the child resided to conduct child find and to provide services for parentally placed private school children. This change did not become effective until July 1, 2005. Because this report includes data from the 2004-05 school year, referrals made by private schools to public school districts outside of their own public school district boundaries are included in this report. This report also includes services provided by school districts outside of the public school districts where the private schools are located.

¹³ *IDEA*, Section 612(a)(10)(A).

¹⁴ Rubenstein, et al., p. 1.

Building on this previous research, this report provides a current overview of details surrounding private school students' participation in federal education programs—how much money is allocated, what services are provided, and in what form. This report examines private school student, teacher and parent participation in 11 of the 12 major *ESEA* programs that have such equity requirements, as well as *IDEA*. The study was guided by four major evaluation questions:

- **Participation.** How many private school students, teachers, and parents participate in federal education programs?
- **Services.** What are the services provided by federal education programs to private school participants?
- **Consultation.** What is the nature and extent of consultation between public school districts and private schools regarding federal education programs?
- **Funding.** What percentage of federal education program funds do public school districts allocate for services to private school participants?

In addition, the study examines the location of Title I, Part A, services provided to private school participants and the child find practices public school districts use to seek out and identify children with disabilities enrolled by their parents in private schools.

Six chapters follow. Chapter 2 describes the research methods behind the study. Chapter 3 provides a description of participation rates of private school students, teachers, and parents in different federal education programs as reported by private schools. Chapter 4 reports on the services provided to private school participants based on responses from both private schools and public school districts. Chapter 5 examines the consultation process, again relying on reports from the private schools and the public school districts. Chapter 6 looks at reports by public school districts on the amount of federal program funds allocated for services for private school participants. Chapter 7, the final chapter, presents overall conclusions. Throughout the report notable differences in the responses of private schools and public school districts are identified. The final section suggests possible reasons for these differences.

2. Methods

Surveys of a nationally representative sample of both public school districts and private schools provide the data for the results presented in this report (Appendix C). The data were collected during the fall and winter of 2005–06. The original sample included 607 public school districts and 1,501 private schools. The response rate was 98 percent for public school districts and 80 percent for private schools. A basic description of the sample design is provided below and a more detailed description of the methods can be found in Appendix B.

Public school districts. The sample universe was created using the National Center for Education Statistics (NCES) Common Core of Data (CCD) Local Education Agency Universe File (2002–03) and the Private School Universe Survey (PSS) (2003–04).

The sample of public school districts was selected prior to the sample of private schools. Public school districts were drawn at random from a list of public school districts with at least one private school located within their geographic boundaries. Public school districts were stratified based on size, rate of free and reduced-price lunch program participation, and number of private school students located within their boundaries. Public school districts with only one or two private schools in their boundaries were further stratified by the religious affiliation of the private schools. Each public school district was randomly selected with a probability proportionate to the number of private schools located within the public school district's boundaries. As a result, public school districts with many private schools located within their boundaries had a much greater chance of entering the sample. In all, 607 public school districts were selected.

This sample design allows an analysis of public school district responses in two different ways. First, the sample can be weighted to represent a simple average of all public school districts with at least one private school within their boundaries. Public school districts with one or many private schools in their boundaries are treated the same. This approach facilitates simple discussion of results by describing the average characteristics of all public school districts regardless of the number of private schools in their boundaries. The primary disadvantage of this approach is that it may give an inaccurate picture of the district where most private schools are located because private schools tend to be concentrated in large public school districts. For example, one third of private schools are located in public school districts with more than 30,000 public school students; but these public school districts represent only 3 percent of public school districts with at least one private school.

The second approach takes into account the distribution of private schools across public school districts by stratifying the public school districts by the number of private schools in their boundaries. In other words, every private school is linked with the data relevant to the public school district in which it is located and the average is taken across all private schools. This approach does not require weighting so the estimates are also more precise than the first approach. The primary disadvantage of this approach is that it is difficult to discuss the public school district results in simple terms because the district results are all implicitly weighted by the number of private schools located in their boundaries.

The different approaches result in differences in descriptions of the public school district context in which private schools operate. For example, the average public school district with at least one private school within district boundaries had about 6,000 public school students. But the average private school was located in a public school district that served nearly 90,000 public school students and that had, on average, 75 private schools within their boundaries (See Exhibit A-2).

While the body of the report provides responses of public school districts in terms of the average public school district with at least one private school in its boundaries, the appendix has two sets of statistics for public school district responses to the survey. The first set is in terms of the average for public school districts with one private school in their boundaries; the second can be interpreted as the percent of private schools operating under certain public school district conditions. Large differences in these estimates are noted in the body of the report.

Private schools. Private schools were randomly selected from those located in the sampled public school districts in inverse proportion to the number of private schools in the public school district. This was done to adjust for the fact that public school districts with larger numbers of private schools had a higher probability of being selected for the district sample. The resulting sample of private schools, therefore, was nationally representative. The private schools were identified using the Private School Universe Survey matched to public school districts by ZIP Code using the Common Core of Data. In order to ensure representative data, private schools were stratified according to the enrollment of the public school district in which they are located, religious affiliation, rate of free and reduced-priced lunch program participation in the public school district in which the private school is located and number of students in the private school. A sample of 1,501 private schools was selected. Catholic schools responded at higher rates than private schools with other religious affiliations. As a result, the data were weighted to adjust for the differential response rate among private schools with different religious affiliations in order to ensure a nationally representative sample of private schools.

One limitation of this data is that data was not collected from organizations like archdioceses, which may have participated in the *IDEA* consultation process on behalf of Catholic schools under its jurisdiction. The questions posed to private schools related to *IDEA* consultation were designed to include consultation that occurred with archdioceses. Nevertheless, the findings on the degree to which consultation took place should be interpreted with caution.

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¹⁵ Private schools were excluded from the sample if they had fewer than 10 students, were located in a private home, or had a major role supporting private home schooling.

3. Private School Participants in Federal Education Programs

ESEA requires that public school districts provide equitable services to eligible private school students, teachers, and parents in certain federal education programs. Public school districts are also required to provide special education and related services to some eligible students under *IDEA*. This section explores private school student, teacher and parent participation in federal education programs. It also examines why private school participants might not take part in these programs.

Key Findings About Private School Participants in Federal Education Programs Under *ESEA* and *IDEA*

ESEA

- Forty-four percent of private schools had at least one participant in an *ESEA* program. However, there was not a single individual *ESEA* program (e.g. Title I, Part A) in which more than 20 percent of private schools had at least one participant.
- Catholic schools were more likely than other private schools to have at least one participant in an *ESEA* program.
- Private schools with *ESEA* program participants tended to be larger than private schools on average (239 students vs. 198 students). This is largely because Catholic schools were significantly more likely to have participants in *ESEA* programs and these private schools tended to be larger than other religious or nonsectarian private schools.
- The percentage of students participating in a particular *ESEA* program in a given private school varied substantially by the religious affiliation and size of the school. For example, while nonsectarian schools were less likely than Catholic schools to have participants in *ESEA* programs, those that did have participants were likely to have a majority of their students participating in four out of the five programs that private schools most often reported having participants.
- The most common reason given by private schools with no *ESEA* participants for not having participants in *ESEA* programs was a conscious decision not to be involved in federal programs (58 percent). However, 40 percent of private schools with no *ESEA* participants reported having no knowledge of federal education programs under *ESEA*.

IDEA

• *IDEA* had the highest percentage of private schools with participants of any federal education program (43 percent).

Private School Participants in *ESEA* **Programs**

There was not a single individual *ESEA* program in which more than 20 percent of private schools had at least one participant. The two *ESEA* programs with the highest levels of participation were State Grants for Innovative Programs (20 percent) and Improving Teacher Quality State Grants (20 percent). The participation rate was over 15 percent in three other programs: Safe and Drug-Free Schools and Communities State Grants (19 percent), Title I, Part A (16 percent), and Educational Technology State Grants (16 percent) (See Exhibit 3).

For six other *ESEA* programs, 6 percent or fewer private schools had at least one participant: Even Start, Reading First, 21st-Century Learning Communities, Mathematics and Science Partnerships, English Language Acquisition, and Migrant Education. These programs generally have lower rates of public school district participation, and therefore, fewer private school students receiving equitable services. As a result of the low levels of participation and the resulting small sample size for these programs, the majority of the report focuses on the five programs where at least 15 percent of private schools had at least one participant.

Exhibit 3
Private Schools With at Least One Participant in Federal Education Programs, 2004–05

	Percent of Private Schools With at Least One Participant
IDEA	43
State Grants for Innovative Programs	20
Improving Teacher Quality State Grants	20
Safe and Drug-Free Schools and Communities State Grants	19
Educational Technology State Grants	16
Title I, Part A	16
Reading First	6
Mathematics and Science Partnership	5
English Language Acquisition	3
21st-Century Community Learning Centers	2
Even Start	1
Migrant Education	0

Exhibit Reads: Forty-three percent of private schools had at least one participant receiving *IDEA* services.

Source: Private School Survey (n=1,121). See Exhibit A-4 for more detailed data.

Overall, 44 percent of private schools had at least one participant in an *ESEA* program. But participation varied widely by religious affiliation. Eighty percent of Catholic schools had *ESEA* program participants, while 28 percent of other religious schools and 25 percent of

nonsectarian schools had reported participants. A similar pattern of participation was evident for the largest *ESEA* program, Title I, Part A. Sixteen percent of private schools overall had participants in Title I, Part A, as compared to more than twice that rate (37 percent) among Catholic schools (See Exhibit 4).

Exhibit 4
Private Schools With at Least One Participant in *ESEA* Programs, 2004–05

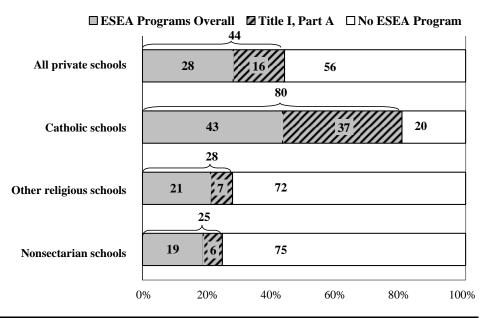


Exhibit Reads: Forty-four percent of private schools had at least one participant in an *ESEA* program. Source: Private School Survey (n=1,121). See Exhibits A-4 and A-5 for more detailed data.

Exhibit 5
Size of Private Schools, 2004–05

As Reported by Private Schools:

	Overall	Catholic	Other Religious	Nonsectarian
Mean number of students in private schools	201	283	165	161
Mean number of students in private schools with no <i>ESEA</i> participants	172	245	161	166
Mean number of students in private schools with <i>ESEA</i> participants	237	292	170	138
Percent of students in private schools with <i>ESEA</i> program participants	51	83	30	17

Exhibit Reads: The average private school had 201 students enrolled.

Source: Private School Survey #23 (n=1,121).

Private schools with *ESEA* program participants tended to be larger than private schools on average (237 students vs. 172 students). This is largely because Catholic schools were significantly more likely to have participants in *ESEA* programs and these private schools tended to be larger than other religious or nonsectarian private schools (See Exhibit 5). However, it could also be because larger private schools are more likely to find it worthwhile to have participants. As a result, a much larger fraction of all Catholic school students were in a private school with at least one *ESEA* program participant (83 percent as compared to 30 percent of other religious private school students and 17 percent of nonsectarian private school students). Overall, about half (51 percent) of private school students were in a private school with at least one *ESEA* participant.

Overall, less than 10 percent of private school students participated in any one of the five federal programs where private schools most often indicated having participants (See Exhibit 6). A higher fraction of students in Catholic schools participated, ranging from 3 percent in Reading First to 23 percent in Safe and Drug-Free Schools and Communities State Grants. In other religious and nonsectarian schools, less than 5 percent of students participated in any one of the five programs.

Exhibit 6
Percent of Private School Students Participating in *ESEA* Programs by School Religious Affiliation, 2004–05

by School Kenglous Affination, 2004–05		
	As Reported by Private Schools:	
_	Percent of Private School Students Participating	

	Overall	Catholic	Other Religious	Nonsectarian
Title I, Part A	3	6	4	1
Reading First	1	3	1	0
Educational Technology State Grants	4	10	2	2
Safe and Drug-Free Schools and Communities State Grants	9	23	2	3
State Grants for Innovative Programs	7	16	3	4

Exhibit Reads: On average, 3 percent of students at a private school participate in Title I, Part A. Source: Private School Survey #11 (n=1,121).

The percentage of private school students participating in *ESEA* programs in each school varied based on the particular program (See Exhibit 7). Of the five *ESEA* programs with the largest number of private schools with participants, the average participation rate of private school students within a private school were lowest in Title I, Part A, and Reading First (22 and 25 percent of students in the average private school, respectively). The other three programs—Educational Technology State Grants, Safe and Drug-Free Schools and Communities State

Grants, and State Grants for Innovative Programs—had a higher percent of students participating (34 percent, 65 percent, and 50 percent of students in the average private school, respectively). The reason for this might be that not all students qualify as eligible for Reading First and Title I, Part A, services. However, it is not possible to know the number of eligible private school students for each program from the available data.

Exhibit 7

ESEA Program Participation Rate of Students at Private Schools
With ESEA Participants by School Religious Affiliation, 2004–05

As Reported by Private Schools:

Percent of Private School Students Participating

	Overall	Catholic	Other Religious	Nonsectarian
Title I, Part A	22	14	22	72
Reading First	25	23	46	20
Educational Technology State Grants	34	34	28	60
Safe and Drug-Free Schools and Communities State Grants	65	66	54	85
State Grants for Innovative Programs	50	49	43	74

Exhibit Reads: Twenty-two percent of students in the average private school with any Title I, Part A, participants participated in Title I, Part A.

Source: Private School Survey #11 (n=477 private schools with ESEA program participants).

The percentage of students participating in a particular *ESEA* program in a given private school varied substantially by the religious affiliation and enrollment of the school. For example, while nonsectarian schools were less likely than Catholic schools to have participants in *ESEA* programs, those that did have participants were likely to have a majority of their students participating in four out of the five programs that private schools most often reported having participants. By comparison, only 14 percent of Catholic school students participated in Title I, Part A, when schools had at least one *ESEA* participant, while the average at nonsectarian schools with *ESEA* participants was 72 percent. This finding also helps explain why, among private schools with at least one participant in *ESEA* programs, the smaller schools (those with fewer than 100 students) tended to have a higher fraction of students participating in most of the five *ESEA* programs (See Exhibit A-7). Nonsectarian private schools with *ESEA* participants have the smallest average number of students (138 compared to the average of 237) (See Exhibit 5).

The Reading First program seemed to follow different patterns related to the density of private school student participation, the religious affiliation of the private school, and private school size. A larger percentage of students in private schools with a religious affiliation other than Catholic participated in Reading First (46 percent compared with 23 percent in Catholic schools

and 20 percent in nonsectarian). Additionally, unlike the other four *ESEA* programs discussed here, the percentage of private school students participating in Reading First was higher in private schools with less than 300 students (20 to 33 percent) than in larger schools (9 to 11 percent).

Exhibit 8
Private Schools With at Least One Student, Teacher or Parent
Participating in ESEA Programs, 2004–05

	Schools With Participants by Group		
•	Students	Teachers	Parents
Title I, Part A	14.0	9.7	0.5
Reading First	4.5	2.9	
Even Start	0.3		0.1
Migrant Education		0.2	
Improving Teacher Quality State Grants		15.9	
Mathematics and Science Partnership	1.2	4.4	
Educational Technology State Grants	5.4	10.9	
English Language Acquisition	1.9	1.1	
Safe and Drug-Free Schools and Communities State Grants	11.4	10.9	
21st-Century Community Learning Centers	0.7		
State Grants for Innovative Programs	9.4	12.1	

Exhibit Reads: Fourteen percent of private schools had students receiving Title I, Part A, services.

Note: Blank cells indicate that categories were not applicable for these subgroups.

Source: Private School Survey #11 (n=1,121).

According to reports from private schools with at least one *ESEA* participant, participation in various *ESEA* programs among private school students and teachers was similar. Eleven percent of private schools reported that at least one of their teachers participated in Safe and Drug-Free Schools and another eleven percent reported having at least one student who participated. Reports from private schools regarding the participation of their students and teachers in Title I, Part A, State Grants for Innovative Programs, and Reading First reflected similar trends. The largest differences in participation levels between students and teachers were seen in Education Technology State Grants and Improving Teacher Quality State Grants with a larger percentage of teachers participating in these programs, which is not surprising given the focus of these programs. Only Title I, Part A, and Even Start provide services directly to parents. Less than one percent of private schools reported having at least one parent who participated in one of these programs (See Exhibit 8).

Reasons Private Schools Do Not Have Participants in ESEA Programs

Of the 56 percent of private schools with no *ESEA* participants, the majority (58 percent) reported that they made a conscious decision not to participate. Forty percent of private schools with no *ESEA* participants reported having no knowledge of federal education programs under *ESEA* (See Exhibit 9). However, 14 percent of the private schools that reported having no knowledge of *ESEA* programs also reported making a conscious decision not to participate. Nonsectarian private schools were significantly less likely than other religious schools to report they made a conscious choice not to participate (See Exhibit A-8). Additionally, 8 percent of private school officials reported that they contacted the public school district to inquire about *ESEA* programs but did not receive a response.

Exhibit 9
Reasons Private Schools Did Not Have Participants in *ESEA* Programs, 2004–05

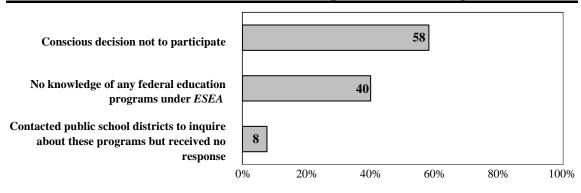


Exhibit Reads: Fifty-eight percent of private schools with no *ESEA* participants consciously decided not to participate in *ESEA* programs.

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Private School Survey (n=644 private schools with no *ESEA* program participants). See Exhibit A-8 for more detailed data.

At private schools where students did not receive Title I, Part A, benefits, the most common reason (50 percent) for lack of student participation was that the private school did not have educationally needy students residing in a Title I, Part A, attendance area. The second most common reason (44 percent) for student nonparticipation was that the private school chose not to participate (See Exhibit 10).

Parentally Placed Private School Participants in IDEA

IDEA had the highest percentage of private schools with participants of any federal education program (43 percent). The rate of participation among Catholic schools with at least one student receiving *IDEA* services (62 percent) was significantly higher than in nonsectarian (39 percent), and other religious private schools (30 percent) (See Exhibit A-4).

Exhibit 10 Reasons Private Schools Did Not Have Student Participants in Title I, Part A, 2004–05

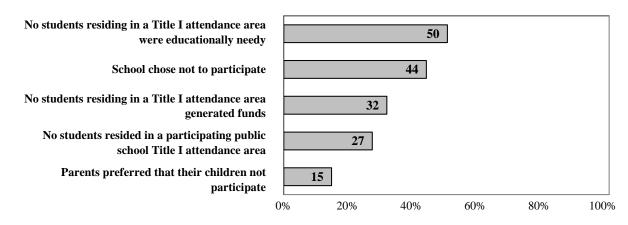


Exhibit Reads: Fifty percent of private schools with *ESEA* program participants but no students participating in Title I, Part A, reported that this was because no students residing in a Title I attendance area were educationally needy.

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Private School Survey (n=477 private schools with ESEA program participants). See Exhibit A-9 for more detailed data.

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4. Provision of Services

Under certain programs, public school districts are required by *ESEA* to provide services and benefits to private school students and teachers that are equitable to the services and benefits that public school students and teachers receive. New *ESEA* requirements for equitable participation of private school participants in Title I, Part A, include parental involvement for parents of Title I participants and professional development for teachers of Title I participants.

In addition, the *IDEA* requires that public school districts carry out timely and meaningful consultation with private school and parent representatives on issues that may affect the equitable provision of services to parentally placed private school students with disabilities in federally funded special education and related services. *IDEA* also requires public school districts to conduct child find activities to locate, identify, and evaluate parentally placed private school students with disabilities attending private schools located in the geographic area served by the district.

This section examines the provision of *ESEA* services to private school participants by public school districts with a special focus on the new requirements for parents and teachers of students participating in Title I, Part A, and the provision of *IDEA* services for private school students with disabilities. It also describes the *IDEA* child find process public school districts use in identifying private school students with disabilities.

Key Findings in the Provision of Services for Federal Education Programs Under *ESEA* and *IDEA*

ESEA

- The vast majority of public school districts containing at least one private school within their boundaries reported providing no services under Reading First; English Language Acquisition; 21st-Century Community Learning Centers; Even Start; Migrant Education; and Mathematics and Science Partnerships. However, this does not take into account whether public school districts received federal funds for these programs or had eligible private school students within district boundaries.
- Private schools reported that the most common services provided through ESEA
 programs were professional development for private school teachers and the provision of
 equipment and materials.
- The majority of public school districts expended Title I, Part A, funds for services based on the number of eligible students in a specific private school. The majority of Title I, Part A, services were provided at the private school site by a public school district employee.

Key Findings in the Provision of Services for Federal Education Programs Under *ESEA* and *IDEA* (continued)

IDEA

- The majority of public school districts reported providing *IDEA* services to parentally placed private school students with disabilities while 11 percent of public school districts reported providing no services to eligible private school students.
- The most common services public school districts provided were speech and language therapy and special education instruction.
- Less than half (45 percent) of private schools indicated that they received information about the referral of students with potential disabilities.
- Public school districts reported identifying twice as many eligible students for *IDEA* services than private schools reported referring to the public school districts.

Provision of *ESEA* **Program Services**

The vast majority of public school districts containing at least one private school within their boundaries reported providing no services under Reading First; English Language Acquisition; 21st-Century Community Learning Centers; Even Start; Migrant Education; and Mathematics and Science Partnerships. Low rates of service provision partially reflect the relatively small number of public school districts that received funds for these programs rather than a failure on the district's part. About half of private schools with ESEA participants had participants who received services from State Grants for Innovative Programs (48 percent) and Improving Teacher Quality State Grants (48 percent), the same programs that public school districts (with at least one private school in their boundaries) most frequently reported providing for private school participants (50 percent) (See Exhibit 11).

Also, as noted earlier, responses from private schools with *ESEA* participants and from public school districts with at least one private school in their boundaries do not necessarily make for accurate cross-comparisons. Private schools tend to be located in very large public school districts that have many private schools within their boundaries. When public school districts responses were weighted to account for the number of private schools in their boundaries, the percent of private schools in public school districts that provide services under State Grants for

¹⁶ Question 11 of the public school district survey asked how much funding public school districts received for each *NCLB* program but did not ask explicitly about participation in a particular program. This means that if a district left an answer blank, it is unclear whether they received no funding for that program (and therefore were a nonparticipant) or whether they simply didn't know how much funding they received (but may actually be participating). As a result, this data can't be reported only for districts that participated. Private schools were not asked about the number of eligible students for federal programs, because they would not necessarily know about a student's eligibility.

Innovative Programs and Improving Teacher Quality State Grants (and other programs) is higher (65 percent and 68 percent, respectively) (See Exhibit A-11).¹⁷ This suggested that public school districts serving a larger fraction of private schools are more likely to provide *ESEA* program services than is otherwise indicated by the simple district percentage.

Exhibit 11
Private School and Public School District Reports of ESEA Program Service Provision, 2004–05

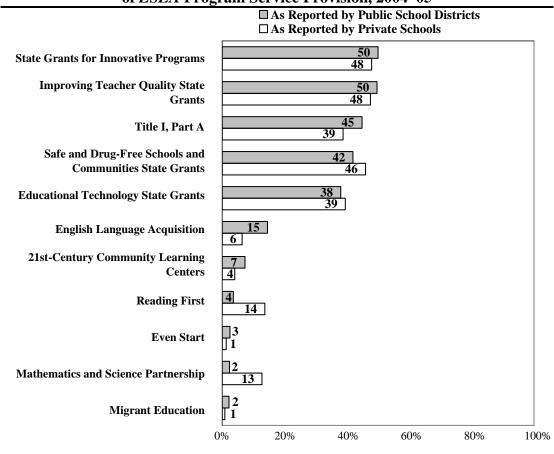


Exhibit Reads: Fifty percent of public school districts reported offering services under State Grants for Innovative Programs for private school participants.

Source: Private School Survey (n=477 private schools with *ESEA* program participants) and Public School District Survey (n=587). See Exhibits A-11 and A-12 for more detailed data.

These weighted public school district findings raise the question: Why are service provision rates reported by private schools lower than the rates reported by public school districts—and by 20 percentage points? One reason may be that public school districts provide services to private school participants in some, but not all, private schools located within their boundaries. Other explanations for these discrepancies are discussed in detail later in this report.

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¹⁷ A similar pattern holds across programs. The percent of private schools in districts that provide services under the following programs is as follows: State Grants for Innovative Programs (65 percent), Improving Teacher Quality State Grants (68 percent), Title I, Part A (62 percent), Safe and Drug Free Schools and Communities (60 percent), Educational Technology State Grants (51 percent) (See Exhibit A-11).

Private schools reported that the most common services provided through *ESEA* programs were professional development for private school teachers and the provision of equipment and materials. Not surprisingly, nearly all private schools with participants in *ESEA* programs identified Improving Teacher Quality State Grants as a source of support for professional development for private school teachers (93 percent), though other programs were also frequently identified. More than half of private schools with participants in the respective programs identified Title I, Part A (54 percent), Safe and Drug-Free Schools (53 percent), Educational Technology State Grants (62 percent), and State Grants for Innovative Programs (74 percent) as sources for equipment or materials. Similarly, among private schools with participants, Title I, Part A, and Safe and Drug-Free Schools were most often reported as sources of instructional services for students (79 and 53 percent, respectively) (See Exhibit 12).

Public school districts reported a similar pattern of service by program with two exceptions. Public school districts were much more likely to report providing professional development through Title I, Part A (63 percent), than private schools reported teachers receiving such services (33 percent). Public school districts were also more likely to report providing Title I, Part A, parental involvement services (60 percent) than private schools reported parents of eligible students receiving such services (27 percent).

More detailed findings suggested that private schools may have underreported professional development and parent involvement services their participants received when asked about these two areas in broad terms. When private schools and public school districts were asked about specific Title I, Part A, parental involvement activities, a much higher percentage reported service provision. Ninety-two percent of public school districts reported providing at least one parental involvement activity to private school parents, and 84 percent of private schools reported that parents received such services (See Exhibit 13). Still, private school—public school district differences remained.

A similar pattern emerged for professional development. As with parental involvement activities, *ESEA* requires equitable participation of private school teachers of Title I, Part A, participants in professional development. When asked about specific Title I professional development activities, a much higher percentage of public school districts and private schools indicated such activities took place than when asked about professional development services generally. Eighty-eight percent of public school districts reported providing at least one professional development activity in the past year, and 83 percent of private schools with at least one participant in Title I, Part A, reported the involvement of their staff in a professional development activity in the past year (See Exhibit 14). Interestingly, a much larger percentage of private schools reported teachers receiving payment for graduate courses and services at the school site than public school districts reported providing.

Exhibit 12 Types of *ESEA* Program Services, 2004–05

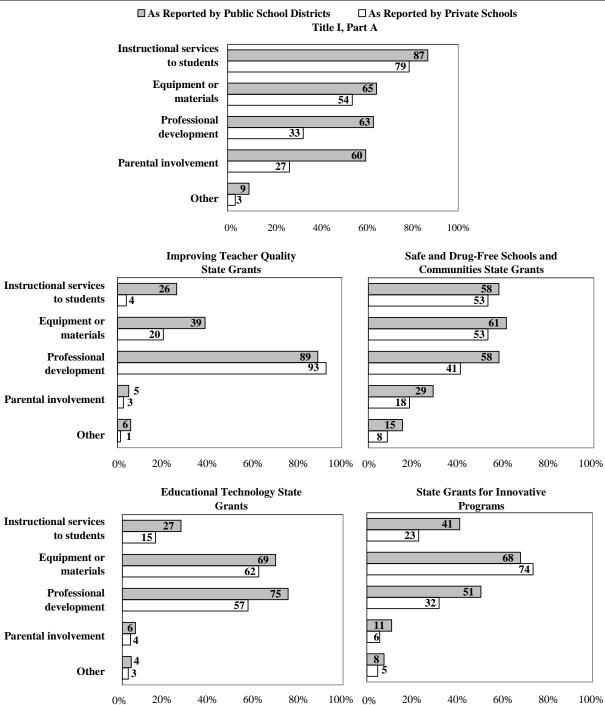


Exhibit Reads: Eighty-seven percent of public school districts that provided Title I, Part A, services provided instructional services to private school students.

Note: Exhibit presents the five ESEA programs with highest participation, as reported by private schools.

Source: Private School Survey (n=477 private schools with *ESEA* program participants) and Public School District Survey (n=587). See Exhibits A-11 and A-12 for more detailed data.

Exhibit 13
Title I, Part A, Parental Involvement Activities, 2004–05

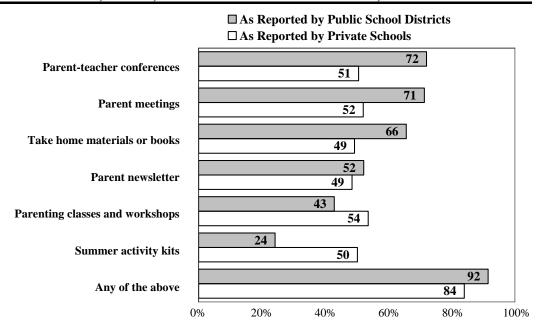


Exhibit Reads: Seventy-two percent of public school districts that provided Title I, Part A, services reported providing parent-teacher conferences as part of Title I, Part A.

Source: Private School Survey (n=188 private schools with Title I, Part A, participants) and Public School District Survey (n=320 public school districts that allocated Title I, Part A, funds for private school participants). See Exhibit A-13 for more detailed data.

Exhibit 14
Title I, Part A, Professional Development Activities, 2004–05

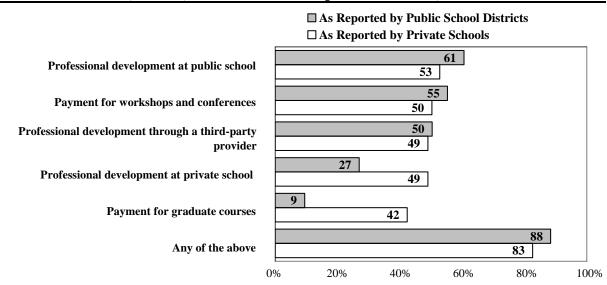


Exhibit Reads: Sixty-one percent public school districts that provided Title I, Part A, services reported offering professional development to private school teachers.

Source: Private School Survey (n=188 private schools with Title I, Part A, participants) and Public School District Survey (n=320 public school districts that allocated Title I, Part A, funds for private school participants). See Exhibit A-14 for more detailed data.

Public school districts were also asked additional questions about Title I, Part A, including how funds were allocated, what services were offered during nonschool hours, and where services were provided. Seventy-eight percent of public school districts providing Title I, Part A, services expended funds for services on a private school by private school basis, based on the number of students in that private school who were from low-income families. Twenty-eight percent of private schools were located in public school districts that expended funds by combining or pooling the funds and providing services to the students most at risk. (See

Exhibit A-15).

Among public school districts that provided Title I, Part A, services to private school students, 37 percent provided these services to private school students during nonschool hours (See Exhibit A-16). Sixty-three percent of public school districts reported that private school students did not participate in Title I, Part A, activities during nonschool hours. Of these districts, 44 percent did not offer extended time services under Title I, Part A, to either public or private school students while 30 percent offered extended time services in which private school students did not participate. Public school districts that provided Title I, Part A, services to private school students reported that services were typically provided by a public school teacher at a private school site (49 percent) (See Exhibit A-17).

Fifty-six percent of public school districts that received Title I, Part A, funds did not provide funds for Title I services to private school participants (See Exhibit A-18). These public school districts reported several reasons for not allocating funds for services to private school students (See Exhibit 15). Notably, public school districts most commonly cited private school refusal as the reason for not providing services. As noted earlier, the majority (58 percent) of private schools, where participants did not receive federal services, made a conscious decision not to participate. However, a significant number of private schools (40 percent) reported no knowledge of federal education programs (See Exhibit 9).

Exhibit 15
Reasons Public School Districts Did Not Allocate Title I, Part A, Funds for Services for Private School Participants, 2004–05

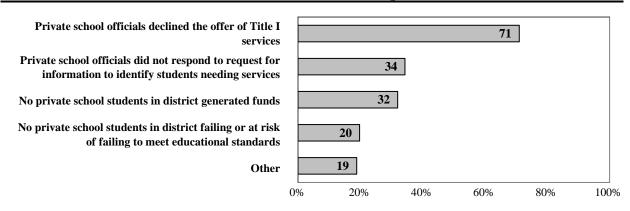


Exhibit Reads: Seventy-one percent of public school districts cited private school refusal of Title I, Part A, services as a reason for not allocating Title I, funds for services for private school participants.

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Public School District Survey (n=161 public school districts that did not allocate Title I, Part A, funds for private school participants. See Exhibit A-18 for more detailed data.

Provision of IDEA Services

The majority of public school districts reported providing *IDEA* services to parentally placed private school students, while 11 percent of public school districts reported providing no services to eligible private school students. The most common reason given by public school districts for not providing any services was parents declining services (61 percent) (See Exhibit A-21). Forty-three percent of private schools reported that they had students receiving IDEA services (See Exhibit A-4). The discrepancy between public school district and private school reporting is at least partially attributable to the fact that while many private schools do not have students receiving *IDEA* services, many public school districts have several private schools inside their boundaries with at least one student receiving such services.

The most common services public school districts provided were speech and language therapy (92 percent) and special education instruction (78 percent) (See Exhibit 16). The top three types of services that private schools reported at least one of their students received were: speechlanguage (45 percent), special education instruction (34 percent), and transportation (19 percent). The provision of services tended to be direct rather than consultative. For example, 63 percent of public school districts reported that special education instructional services were direct while 15 percent reported that they were consultative (See Exhibit A-19). Both public school districts and private schools reported that these services were somewhat more likely to happen at public school sites than private school sites (See Exhibit A-20).

IDEA Services, 2004–05 As Reported by Public School Districts As Reported by Private Schools 92 Speech-language 45 78 Special education instruction 34 47 **Transportation** 19 47 Occupational therapy 17 Audiology 0% 20% 40% 60% 80% 100%

Exhibit 16

Exhibit Reads: Ninety-two percent of public school districts that provided IDEA services for private school participants provided speech-language services.

Source: Private School Survey (n=1,121) and Public School District Survey (n=436 public school districts providing IDEA services for private school participants). See Exhibit A-19 for more detailed data.

Thirty-eight percent of public school districts reported providing *IDEA* services to some but not all eligible private school students (See Exhibit A-22). Eighty-one percent of public school districts reported that the reason not all eligible private school students received services was parental refusal of services. Twenty-nine percent reported inadequate *IDEA* funds as a reason

that not all eligible children received services (See Exhibit 17). It is important to note that *IDEA* does not require that all eligible students receive services or that public school districts spend more than the proportionate share of *IDEA* funds to provide services to eligible private school students.

Exhibit 17
Reasons Public School Districts Provided *IDEA* Services to Some But Not All Eligible Private School Students, 2004–05

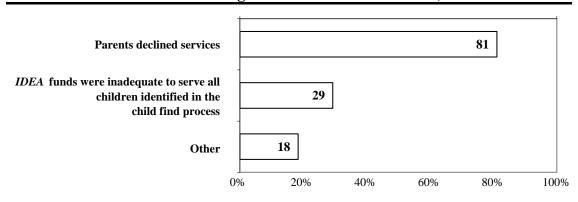


Exhibit Reads: Eighty-one percent of public school districts that did not provide *IDEA* services for all eligible private school students reported that it was because parents declined the services.

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Public School District Survey (n=436 public school districts providing *IDEA* services for private school participants). See Exhibit A-22 for more detailed data.

IDEA "Child Find" Practices

In addition to spending a proportionate amount of federal funds for special education and related services for children with disabilities enrolled in private schools by their parents, public school districts are also required to conduct "child find" activities similar to the activities used for locating, identifying, and evaluating students with disabilities in public schools.

Ninety-two percent of public school districts with at least one private school in their boundaries reported conducting a child find process to identify *IDEA* eligible students in private schools. **In contrast, less than half (45 percent) of private schools indicated that they received information about the referral of students with possible disabilities** (See Exhibit A-23). Fifty-three percent of private schools reported receiving information from the local public school district regarding services for private school students with disabilities.

Public school districts reported that their own staff most frequently determined *IDEA* eligibility for private school students (86 percent). Thirty-three percent of public school districts reported using a contracted third party (See Exhibit A-25). Public school districts reported identifying twice as many students eligible for services than private schools reported referring for services (See Exhibit 18).

Exhibit 18
Private School Reports of the Average Number of Parentally Placed
Private School Students Identified for Special Education Services, 2004–05

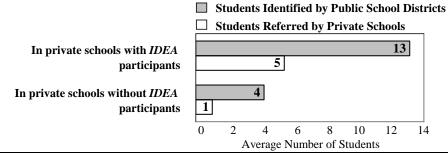


Exhibit Reads: In private schools with *IDEA* participants, an average of 13 students were identified for special education services by the public school district.

Source: Private School Survey (n=1,121). See Exhibit A-24 for more detailed data.

In order to fulfill their *IDEA* obligations to conduct a thorough child find process, public school districts engaged in a variety of child find activities, including outreach to private schools, distribution of informational brochures, and providing information on Web sites (See Exhibit 19). Seventy-two percent of public school districts with at least one private school located within their boundaries provided outreach to private schools, which was the most common child find activity for identifying students with disabilities.

Exhibit 19
Child Find Procedures Used to Identify Parentally Placed Private School Students Eligible for *IDEA* Services, 2004–05

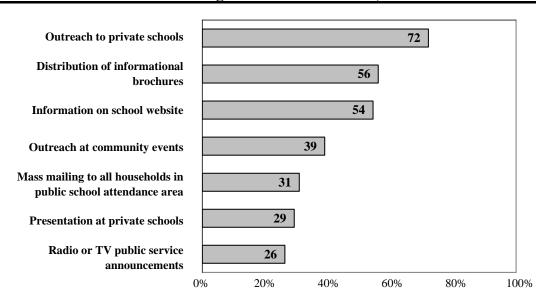


Exhibit Reads: Seventy-two percent of public school districts used outreach to private schools in their child find procedure for *IDEA*.

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Public School District Survey (n=587). See Exhibit A-26 for more detailed data.

Private schools can assist public school districts with child find activities but are not required to do so. Forty-three percent of private schools provided public school districts with contact information of parents of students with suspected disabilities (See Exhibit 20). In addition, 37 percent of private schools reported referring students or parents to the public school district's *IDEA* representative. A smaller percentage of private schools also engaged in other assistance activities, including organizing parent information sessions (18 percent) and providing the public school district with a mailing list of all parents (11 percent). Forty-two percent of private schools reported that the public school district did not ask for the private school's assistance with child find activities.

Exhibit 20 Private School Assistance in Child Find Activities, 2004–05

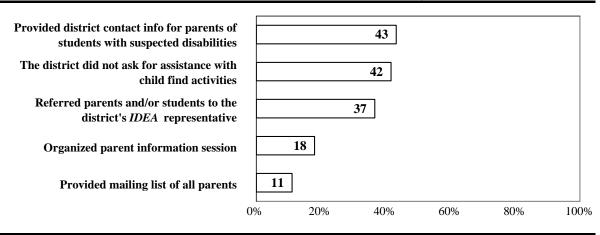


Exhibit Reads: Forty-three percent of private schools provided contact information for parents of students with suspected disabilities to the public school district.

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Private School Survey (n=1,121). See Exhibit A-27 for more detailed data.

5. Consultation Process

Consultation between public school districts and private schools is required by both *ESEA* and *IDEA* before any decision is made that affects the opportunities of eligible private school students and teachers to participate. For both *ESEA* and *IDEA* the consultation must be timely and meaningful. Public school districts and private schools engage in consultation for *ESEA* programs regarding identifying students' and teachers' needs, types of services, provision of services, program assessment, size, scope and funding of services, third-party providers, and public school districts' decision-making processes about the services. Title I, Part A, requires consultation to include additional topics and written confirmation of consultation. New requirements of *ESEA* have expanded Title I, Part A, consultation topics to include parental involvement and professional development.

IDEA also includes a consultation provision that requires public school districts to consult with private school representatives and representatives of parents of children with disabilities during the design and development of special education and related services regarding: a) child find; b) proportionate share of funds; c) consultation process; d) provision of special education and related services; and e) written explanation by the public school district regarding services. Public school districts may consult with individual private schools or organizations that represent a group of schools, like an archdiocese. Public school districts are required to expend a proportionate share of *IDEA* funds for services to private school students with disabilities.

Key Findings in Consultation Process for Federal Education Programs under ESEA and IDEA

ESEA

- Public school districts and private schools with participants in a particular *ESEA* program generally reported similar levels of consultation about that *ESEA* program.
- Limited communication from the public school district was the most common reason private schools gave for the absence of timely and meaningful consultation. Seven percent of public school districts identified poor coordination within the public school district office as a barrier to timely and meaningful consultation.
- The most common topics discussed in consultations included the needs and numbers of eligible students, the amount of funding available, the types of services to be provided, and the location of services. Newly required topics for Title I, Part A (professional development and parent involvement), were discussed less frequently than long-standing requirements.

Key Findings in Consultation Process for Federal Education Programs under *ESEA* and *IDEA* (continued)

IDEA

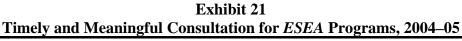
• Thirty-eight percent of private schools reported that the public school district engaged in timely and meaningful consultation with private school officials, representatives, or parents regarding participation in *IDEA*, while 86 percent of public school districts reported conducting such consultations with appropriate parties. *IDEA* does not require public school districts to consult with all private schools but rather with private school representatives and representatives of parents of parentally placed students with disabilities attending private schools located in the district. However, the public school district may consult with a representative of the private school and the private school may be unaware of the consultation.

ESEA Program Consultation

For *ESEA*, 28 percent of private schools with at least one *ESEA* participant reported that the relevant public school district did not consult with them about *ESEA* program participation (See Exhibit A-31). However, within many of the individual *ESEA* programs, a vast majority of both public school districts and private schools with participants in a particular program reported taking part in timely and meaningful consultation as required. **Moreover, public school districts and private schools with participants in a particular program generally reported similar levels of consultation about that** *ESEA* **program. For example, consultation about Title I, Part A, was particularly high with 97 percent of public school districts and 92 percent of private schools reporting that timely and meaningful consultation about this program had taken place. There were only three programs in which fewer than 80 percent of private schools with participants reported engaging in required consultation with the public school district. Among the programs in which fewer private schools reported having participants, including Mathematics and Science Partnership and Migrant Education, a higher percentage of private schools with participants in a particular program reported consultation than public school districts (See Exhibit 21).**

Exhibit 21 helps illustrate that among private schools with participants in a particular program, a large majority engages in consultation related to that program. However, it does not examine whether there are high rates of participation when considering *all* private schools that engaged in consultation. One might expect that private schools engaging in consultation about a program would be more likely to have participants in that program. This appears to be the case for most of the larger programs. For example, 59 percent of private schools with at least one *ESEA* program participant consulted about State Grants for Innovative Programs and 81 percent of those private schools had participants in the program (See Exhibit A-29). Similar results were found for Improving Teacher Quality State Grants, Safe and Drug-Free Schools and Communities State Grants, and Educational Technology State Grants. For Title I, Part A, 71 percent of private schools with one *ESEA* program participant consulted about the program, but 51 percent of those

private schools had participants in the program. This may be because of the eligibility requirements of Title I, Part A. In the smaller programs, such as Even Start and 21st-Century Community Learning Centers, a lower fraction of private schools that engaged in consultation about the program have participants in those programs. For example, 12 percent of private schools consulted about 21st-Century Community Learning Centers and 27 percent of those private schools participated in that program. This may be because this is a discretionary grant, targeted to serving a more limited number of public school students within the district and, thus, a more limited number of private school students.



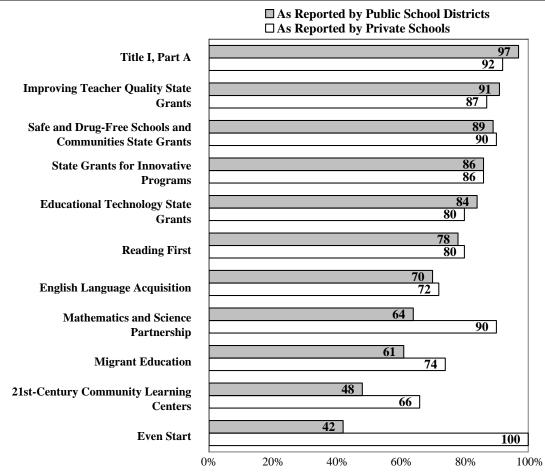


Exhibit Reads: Ninety-seven percent of public school districts that reported offering Title I, Part A, services to private school participants offered timely and meaningful consultations with private schools about Title I, Part A. Source: Private School Survey (n=477 private schools with participants in the given program) and Public School District Survey (n=587 public school districts providing given program services for private school participants). See Exhibit A-28 for more detailed data.

Among students at private schools with participants in a given *ESEA* program, large majorities were found to be attending a private school that had engaged in consultation regarding the particular program (See Exhibit 22). For example, more than 90 percent of students who attended private schools in which participants received services under Title I, Part A, Math and

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Science Partnerships, or Safe and Drug-Free Schools and Communities State Grants attended a private school that engaged in consultation with the public school district regarding these programs. Among students at private schools with other participants receiving services under Even Start, fully 100 percent attended a private school that reported engaging in consultation with the public school district. With regard to other programs, the percentage remained near 80 percent, not including the 21st-Century Community Learning Centers program in which only 59 percent of students attending a school with program participants attended a school that also engaged in consultation. For the most part, these numbers are consistent with the numbers reported in Exhibit 21, which show the number of private schools with *ESEA* program participants that also reported engaging in consultation. The only noticeable disparity is with the Migrant Education program. Although 74 percent of private schools with participants in the program reported engaging in consultation, 97 percent of students that attended a private school with Migrant Education participants were attending a school that had engaged in consultation.

Exhibit 22
Among Private Schools With Participants in a Particular *ESEA* Program, the Percent of Students Who Attended a Private School That Engaged in Timely and Meaningful Consultation, 2004–05

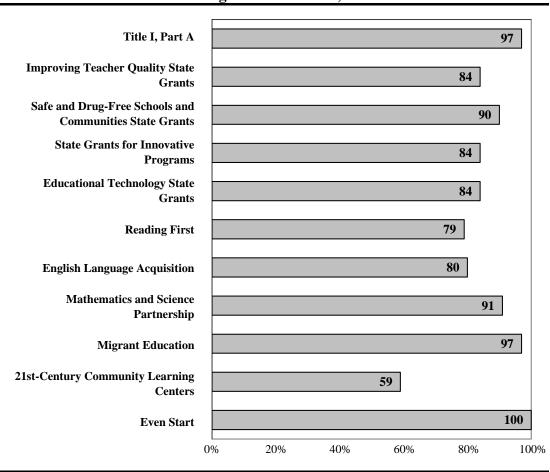


Exhibit Reads: Among private schools that have Title I, Part A, participants, 92 percent of students attended a private school that engaged in timely and meaningful consultation with the local public school district regarding the program.

Source: Private School Survey #18 and #19 (n=1,121).

Eighty-nine percent of private schools with *ESEA* program participants reported that the official who engaged in consultation was a school level administrator from the private school, though nearly half reported that officials at the diocesan or association level were involved (See Exhibit 23).

Exhibit 23 Private School Officials Engaging in *ESEA* Consultation, 2004–05

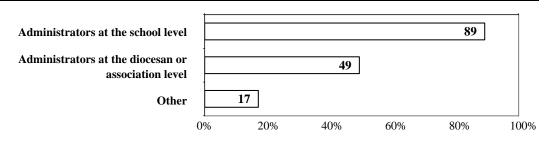


Exhibit Reads: Eighty-nine percent of private schools reported that administrators at the school level engaged in consultation with the public school district.

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Private School Survey (n=358 private schools where consultation occurred). See Exhibit A-30 for more detailed data.

Private schools that reported that they did not engage in timely or meaningful consultation with the relevant public school district most commonly also reported the reason was that the public school district did not contact them (64 percent). Over one quarter (28 percent) reported that they chose not to participate in consultation (See Exhibit 24).

Exhibit 24
Reasons *ESEA* Consultation Did Not Take Place, 2004–05

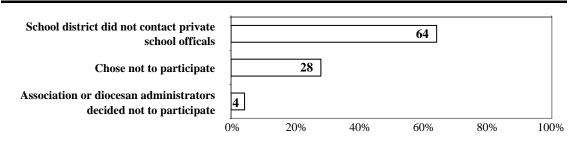


Exhibit Reads: Sixty-four percent of private schools with ESEA program participants, but where consultation did not occur, reported that the school district did not contact the private school officials.

Source: Private School Survey (n=133 private schools with *ESEA* program participants where *ESEA* consultation did not occur). See Exhibit A-31 for more detailed data.

Barriers to Timely and Meaningful ESEA Consultation

Private schools and public school districts were also surveyed about the barriers that affected timely and meaningful consultation. Limited communication from the public school district was the most common reason private schools gave for the absence of timely and meaningful consultation (34 percent). More than one-quarter of private schools also reported that limited

understanding of the equitable participation requirements by public school districts was a barrier to effective consultation (See Exhibit 25).

For public school districts, the most commonly cited barrier to timely and meaningful consultation was lack of assistance from private schools in identifying the needs of their students and teachers (23 percent). The next most common barrier reported by public school districts was their own limited understanding or experience with the equitable participation requirements of *ESEA* programs (13 percent). Seven percent of public school districts identified poor coordination within the public school district office as a barrier to timely and meaningful consultation.

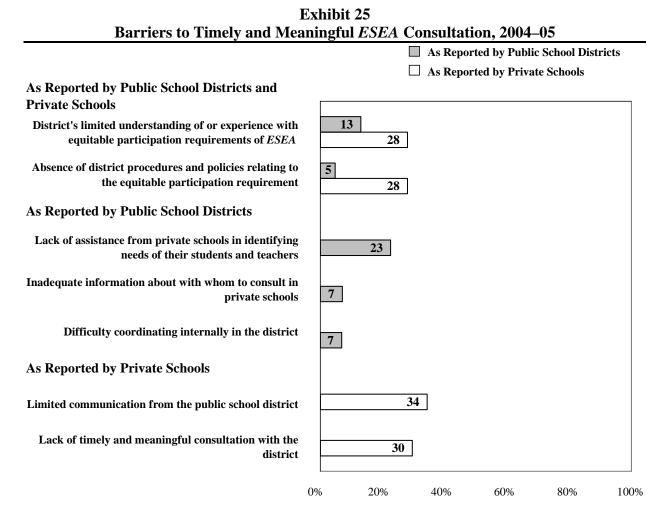


Exhibit Reads: Thirteen percent of public school districts reported that the public school district's limited understanding of equitable participation requirements as a barrier to consultation.

Note: Percentages reported in this exhibit include responses of "somewhat of a barrier" or "major barrier."

Source: Private School Survey (n=477 private schools with *ESEA* program participants) and Public School District Survey (n=587 public school districts providing given program services for private school participants). See Exhibit A-33 for more detailed data.

Topics Covered in Consultation

The most common topics discussed in consultations included the needs and numbers of eligible students, the amount of funding available, the types of services to be provided, and the location of services. These reports come from private schools that had participants in *ESEA* programs. Special topics of consultation associated with Title I, Part A, are discussed after the more general *ESEA* consultation topics.

While there was some variation in consultation topics across *ESEA* programs, the amount of funding available tended to be the most frequently discussed topic and the location of services to be least frequently discussed topic (See Exhibit 26).

Exhibit 26 ESEA Program Consultation Topics, 2004–05 ■ As Reported by Public School Districts ☐ As Reported by Private Schools **Improving Teacher Quality State Grants Educational Technology State Grants Professional development** Amount of funding available Types of services Service location Needs of students 0% 20% 40% 60% 80% 100% 20% 40% 60% 80% 100% Safe and Drug-Free Schools and **State Grants for Innovative Programs** Communities Professional development Amount of funding available Types of services 53 Service location Needs of students 0% 20% 40% 100% 20% 40% 100%

Exhibit Reads: Ninety percent of public school districts providing Improving Teacher Quality State Grants services reported consulting with private schools about professional development.

Note: Exhibit presents the four ESEA programs with highest participation, as reported by private schools.

Source: Private School Survey (n=477 private schools with participants in the given program) and Public School District Survey (n=587 public school districts providing given program services for private school participants). See Exhibit A-34 for more detailed data.

The *No Child Left Behind Act* introduced new consultation requirements for Title I, Part A. In addition to already existing requirements, consultation must include discussion of how services will be academically assessed, professional development, and activities for parents. **Both public school districts and private schools reported that, in general, newly required topics for Title I, Part A, were discussed less frequently than long-standing requirements.** For example, the topics most frequently reported as a focus of consultation were two long-standing required topics: 'types of services' (81 percent of public school districts and 83 percent of private schools) and 'number of students generating funds' (80 percent of public school districts and 73 percent of private schools). The topic that was least often identified as a subject of consultation was among the new required topics: 'activities for parents' (52 percent of public school districts and 41 percent of private schools) (See Exhibit 27).

Catholic schools were more likely to report that consultations occurred than either other religious or nonsectarian private schools, and larger public school districts were more likely to report consultation had occurred than smaller public school districts (See Exhibit A-35).

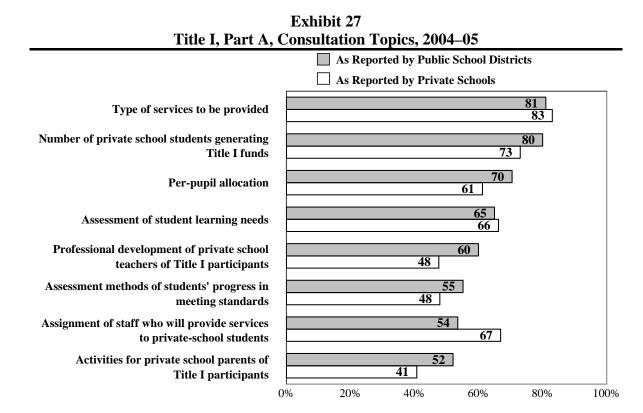


Exhibit Reads: Eighty-one percent of public school districts reported that Title I, Part A, consultation included discussion of the types of services to be provided.

Source: Private School Survey (n=188 private schools with Title I, Part A, participants) and Public School District Survey (n=488 public school districts that received Title I, Part A, funds). See Exhibit A-35 for more detailed data.

Records of Consultation

Title I, Part A, requires that public school districts maintain a written affirmation of consultation signed by officials of each participating private school. Some districts maintain additional

written records of consultation regarding Title I, Part A, and the other programs requiring equitable participation. Consultation documentation can take several forms, including letters of intent to participate in programs, written records of meetings and other types of consultations themselves, and sign-off forms used to ensure that adequate consultation has taken place. Eighty-one percent of public school districts maintained written records of Title I, Part A, consultation and 72 percent reported using a sign-off form for Title I. The vast majority of public school districts also reported keeping written records of consultation about other *ESEA* programs (See Exhibit A-36).

IDEA Consultation

There was a contrast in consultation rates for *IDEA* between private schools and public school districts. Thirty-eight percent of private schools reported that the public school district engaged in timely and meaningful consultation with private school officials, representatives, or parents regarding participation in *IDEA*, while 86 percent of public school districts reported conducting such consultations with appropriate parties (See Exhibit 28). *IDEA* does not require public school districts to consult with all private schools but rather with private school representatives and representatives of parents of parentally placed students with disabilities attending private schools located in the district. However, the public school district may consult with a representative of the private school and the private school may be unaware of the consultation.

IDEA Consultation, 2004–05 **■** As Reported by Public School Districts ☐ As Reported by Private Schools 86 **Consultation Occurred** 38 96 Administrators 49 **Private School** Representatives 53 **Parents** 40 Engaging in Consultation Organization 0% 20% 40% 60% 80% 100%

Exhibit 28 *IDEA* Consultation, 2004–05

Exhibit Reads: Eighty-six percent of public school districts reported offering timely and meaningful consultation regarding participation in *IDEA*.

Note: A private school organization could be an archdiocese or other organization that provides support to private schools. Numbers sum to more than 100 percent because respondents could mark multiple responses. Source: Private School Survey (n=1,121) and Public School District Survey (n=587). See Exhibit A-37 for more detailed data.

The survey asked who represented private schools in the consultations and just under half (49 percent) of private schools participating in consultations reported that school level administrators engaged in *IDEA* consultations. Yet almost all (96 percent) of the public school districts reported that they consulted with private school administrators at the school level. About one-third of private schools reported that representatives from an intermediary

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¹⁸ For private schools with students receiving *IDEA* benefits, 67 percent reported participating in consultations.

organization participated in consultations. Such organizations would include associations that represent a number of private schools as well as diocesan organizations. Parents were reportedly also involved in consultation. Forty percent of private schools reported that parents participated in *IDEA* consultations while just over 50 percent of public school districts reported consultation with parents. Almost 60 percent of public school districts and private schools reported that there was written documentation of *IDEA* consultations (See Exhibit A-37).

Topics Covered in IDEA Consultations

IDEA requires that public school districts engage in consultation about a number of topics that impact the design, development, and provision of equitable special education services for eligible private school students with private school representatives and representatives of parents of parentally placed students with disabilities attending private schools located in the district. According to public school districts, the most common *IDEA* topics covered in consultation were the identification of eligible children, the location of services, and the types of special education services to be provided. Between 89 and 94 percent of public school districts reported that their consultations covered these topics (See Exhibit 29).

Exhibit 29
Public School District *IDEA* Consultation Topics, 2004–05

		Percent of Public School Districts
Consultation occurred		86
Of districts in	dicating that consultation occurred	
Topics of IDEA consultation	Location of services	94
	Types of special education and related services and alternative service delivery mechanisms	92
	The identification of eligible students through the child find process	89
	Informing private school representatives about the child find process	88
	How and when decisions on the delivery of special education services are provided will be made	88
	How the consultation process will operate throughout the school year	87
	How the share of federal <i>IDEA</i> funds available for private school students was calculated	67
	How district will explain reasons for not providing services when disagreeing with private school officials	65
	How to distribute funds if insufficient to serve all children	50

Exhibit Reads: Eighty-six percent of public school districts reported *IDEA* consultation occurred.

Source: Public School District Survey (n=587). See Exhibit A-39 for more detailed data.

More than half of private schools reported that these same issues, as well as others, were handled in a useful manner in consultation. Consultation on topics related to the amount of funds available for private school students, handling disagreements about services, and distribution of funds if insufficient were less likely to be considered useful, according to private school reports (See Exhibit 30). For a number of topics, Catholic schools were significantly more likely to consider consultations useful (See Exhibit A-38).

Exhibit 30 Private School Reports of Useful Consultation, 2004–05

		Percent of Private Schools
Consultation occurred		38
Of private sch	ools indicating that consultation occurred	
Topics of IDEA consultation reported useful	Location of services	66
	Types of special education and related services and alternative service delivery mechanisms	61
	The identification of eligible students through the child find process	61
	Informing private school representatives about the child find process	56
	How and when decisions on the delivery of special education services are provided will be made	56
	How the consultation process will operate throughout the school year	62
	How the share of federal <i>IDEA</i> funds available for private school students was calculated	41
	How district will explain reasons for not providing services when disagreeing with private school officials	44
	How to distribute funds if insufficient to serve all children	33

Exhibit Reads: Thirty-eight percent of private schools reported *IDEA* consultation. Note: Useful is defined to be a response of 3 or higher on a 4 point scale ranging from 1="not useful" to 4="very useful."

Source: Private School Survey (n=1,121). See Exhibit A-38 for more detailed data.

Other Sources Utilized by Public School Districts and Private Schools for Assistance in Implementing Federal Education Programs

Public school districts often utilized various sources for guidance in implementing *ESEA* and *IDEA* requirements. The three most common sources of assistance included: the state (75 percent), the U.S. Department of Education Web site (56 percent), and U.S. Department of Education publications (55 percent) (See Exhibit 31). The most common source of assistance private schools relied on was U.S. Department of Education publications (28 percent).

Only a small fraction of public school districts (10 percent) and private schools (13 percent) used district-wide working groups for technical assistance. Interestingly, public school districts appeared to have a higher level of service provision for private school participants where this was the case. ¹⁹ **More specifically, public school districts with these working groups had higher odds of providing services to private school participants in some** *ESEA* **programs.** ²⁰ Similarly, private schools that took part in such groups were more likely to have participants in *ESEA* programs (See Exhibit A-40). ²¹

Exhibit 31
Technical Assistance for Implementation of Federal Education Programs, 2004–05

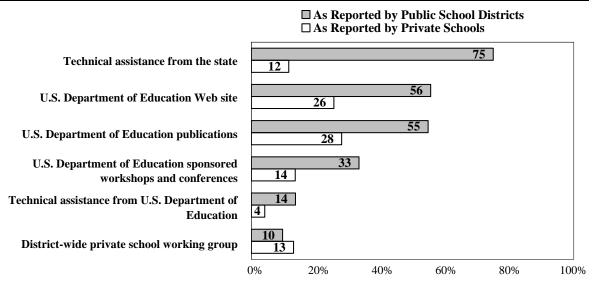


Exhibit Reads: Seventy-five percent of public school districts received technical assistance from their state for assistance in implementing federal education programs.

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Private School Survey (n=1,121) and Public School District Survey (n=587). See Exhibit A-40 for more detailed data.

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¹⁹ Analysis limited to the five *ESEA* programs with the highest percentage of private school participants.

Specifically, Improving Teacher Quality Grants and Safe and Drug-Free Schools & Communities, controlling for public school district size, poverty, and location.
 The ESEA programs include specifically, Title I, Part A, Improving Teacher Quality State Grants, Educational

²¹ The *ESEA* programs include specifically, Title I, Part A, Improving Teacher Quality State Grants, Educational Technology State Grants, Safe and Drug-Free Schools & Communities, and State Grants for Innovative Programs, controlling for urban setting and religious affiliation.

6. Funding

For *ESEA* programs, public school districts are required to spend an equal per-pupil amount of funds to serve public and private school students, teachers, and parents, taking into account the number and educational needs of those participants. *IDEA* requires that public school districts spend a proportionate amount of funding on special education and related services to such eligible children enrolled in private schools.

Key Findings on Funding for Private School Participants in Federal Education Programs

ESEA

- The average public school district allocated between 2 and 6 percent of *ESEA* program funding for services for private school students depending on the program.
- Thirty-eight percent of private schools were aware of the amount of Title I, Part A, funds their students from low-income families generated.
- The majority of public school districts utilized the same method for identifying low-income private school students and for identifying public school students.

IDEA

• Twenty-nine percent of public school districts reported inadequate *IDEA* funds as the reason for serving some but not all parentally placed students with disabilities.

Public School District Expenditures for Services for Private School Students in *ESEA* Programs

Public school districts were surveyed about the funds they received for various *ESEA* programs and the percentage of those funds allocated for services for private school participants. The two largest *ESEA* programs by funding level were Title I, Part A, and Improving Teacher Quality State Grants. The average public school district with at least one private school located in its boundaries was allocated \$1.47 million and \$349,962 for these two programs, respectively (See Exhibit 32). However, because private schools are concentrated in large public school districts the average private school is in a district with considerably more federal program funds (See Exhibit A-42).

Public school districts typically allocated between 2 percent and 6 percent of total *ESEA* **program funding for serving private school participants.** The *ESEA* program with the highest average percentage allocated for services to private school students was State Grants for Innovative Programs; the average public school district reported that 6 percent of its State Grants for Innovative Programs funds were allocated for services to private school participants. The lowest was Title I, Part A, in which 2 percent of funds were allocated for services for private

school participants. This may partially be attributable to low rates of low-income private school students and the low rate of private school participation overall in Title I, Part A (14 percent).

Exhibit 32 ESEA Program Fund Allocation, 2004–05

		Title I, Part A	Improving Teacher Quality State Grants	Educational Technology State Grants	Safe and Drug- Free Schools and Communities	State Grants for Innovative Programs
Average Funding for Public School District	Average total district allocation (dollars)	\$1.474.999	\$349,962	\$39,428	\$40,289	\$32,256
	Average percent of total set aside for services for private school participants	2%	3%	4%	5%	6%

Exhibit Reads: The average public school district was allocated a total of \$1.47 million for Title I, Part A, 2 percent of which was allocated for services for private school participants.

Note: Exhibit presents the five ESEA programs with highest participation, as reported by private schools.

Source: Public School District Survey (n=587). See Exhibit A-42 for more detailed data.

Private schools were asked about the Title I, Part A, funds that were used for services for private school students. Thirty-eight percent of private schools surveyed knew the amount of Title I, Part A, funds generated by their students from low-income families and residing in Title I attendance areas. Of these private schools, the average amount expended for Title I, Part A, services was \$953 per private school student (See Exhibit A-43).

Determining the Number of Private School Students From Low-Income Families

The *ESEA* legislation allows four methods for determining the number of private school students eligible for Title I, Part A, funds within a public school district's boundaries. These include using the same method of counting that is used for public school children, confidentially surveying families of private school students, applying the percentage of low-income public school students in the participating public school attendance area to the number of private school students in that attendance area, or using a low-income measure that correlates with the measure used to determine low-income public school students.²² **Seventy-three percent of public school districts participating in Title I, Part A, reported using the same method of determining poverty in both public and private schools (See Exhibit A-44).**

Fifty-two percent of private schools that had participants in *ESEA* programs provided some type of assistance to aid public school districts in identifying eligible students. Seventy-two percent of private schools that assisted public school districts in identifying students eligible for

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²² ESEA, Section 1120(c)(1).

Title I, Part A, provided the names and addresses of students to the public school district.²³ This was the most common form of assistance (See Exhibit A-45).

IDEA Funding

Twenty-nine percent of public school districts that reported providing *IDEA* services to some but not all parentally placed private school students with disabilities indicated that they had inadequate *IDEA* funds to serve all eligible private school students within their boundaries. Public school districts are required to expend a proportionate share of federal *IDEA* funds, which is calculated based on a formula in the regulations, to provide services to parentally placed private school children with disabilities. Among districts that did not provide any *IDEA* services to any parentally placed private school students with disabilities, 3 percent reported having inadequate funds. In both cases, large majorities of public school districts reported that parental refusal of services was the reason they served some or none of the *IDEA* eligible private school students within their boundaries (See Exhibit A-22).

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²³ In order to protect the identity of low-income families, the Department has issued guidance that public school districts should not require private schools to give them the names of low-income families.

7. Conclusions

This study examined the extent to which private school students, teachers, and parents, participate in federal education programs authorized under the *Elementary and Secondary Education Act (ESEA)* and the *Individuals With Disabilities Education Act (IDEA)*. It also examined the consultation process between private schools and public school districts regarding a number of topics related to the provision of services and eligibility requirements for these programs. Last, it looked at how public school districts allocated federal funds to support the equitable participation of private school participants in these programs. A national sample of 607 public school districts and 1,501 private schools were surveyed for the analysis.

The picture presented is not a simple one. Discrepancies existed between the reports of private schools and public school districts in a number of places but not in all of them. These differences involved timely and meaningful consultations between public school districts and private schools and public school district provision of services for private school participants. In general, public school districts consistently reported higher levels of consultation and service provision than private schools. There are some plausible reasons for the discrepancies. For one, public school districts may only have consulted with *some* rather than all relevant private schools. Under IDEA public school districts are not required to consult with all private schools but rather with private school representatives and representatives of parents of parentally placed students with disabilities attending private schools located in the district or to provide services to all eligible private school students. In addition, private schools may not have perceived certain activities carried out by public school districts as services. For example, private schools with Title I, Part A, participants often reported that public school districts did not provide parental involvement activities or professional development. But when explicit examples were given, the vast majority of these private schools indicated that their participants had received services. However, it is also clear that some public school districts are not consulting with private schools and not providing services to private school participants.

Highlights of the results are below.

Participation in Federal Education Programs

Over 40 percent of private schools had participants in *IDEA*; however, there was not a single *ESEA* program in which more than 20 percent of private schools had participants. A much higher fraction of Catholic schools had participants in *ESEA* programs, especially Title I, Part A.

In the majority of cases where a private school did not have participants in any *ESEA* program, the private school had made a conscious decision not to participate. However, 40 percent of private schools without participants in such programs reported having no knowledge of their availability.

Provision of Services and Funding

Among private schools that had participants in *ESEA* programs, private schools most frequently reported that participants received services related to professional development and equipment and materials. Generally, public school districts reported a somewhat higher level of service provision than private schools. These differences between private schools and the public school districts may partially be a result of different perceptions of what constitutes certain services. As noted earlier, when private schools were asked generally about Title I, Part A, parental involvement services and professional development, a minority of private schools reported receiving services. However, when specific examples of these services were given, a large majority of private schools with Title I, Part A, participants indicated that parents or teachers had received services.

Public school districts allocated between 2 and 6 percent of their federal education funds for services for private school students, teachers, and parents.

Consultation

The majority of private schools with participants in *ESEA* programs reported participating in consultation with public school districts regarding *ESEA* program participation.

Title I, Part A, was the most commonly discussed program in consultations between public school districts and private schools. Title I, Part A, requires written affirmation that consultation has occurred. Other programs for which a large percentage of private schools reported engaging in consultation were Teacher and Principal Recruiting and Training, Enhancing Education Through Technology, Safe and Drug-Free Private Schools and Communities; and State Grants for Innovative Programs.

The topics most frequently discussed in these consultations included the needs and numbers of eligible students, the amount of funding available, and the types of services to be provided. In Title I, Part A, consultations, the most common topics discussed were the number of students generating funds, decisions regarding which students would receive services, and the types of services to be provided. Less than half of private schools that participated in Title I, Part A, consultations reported that these consultations covered parental activities, assessment methods, and professional development in a timely and meaningful way, even though they are required.

Less than half of all private schools reported consultation regarding *IDEA* services. However, *IDEA* does not require public school districts to consult with all private schools but rather private school representatives and representatives of parents of parentally placed students with disabilities attending private schools located in the district. The most frequently reported topics of *IDEA* consultations were the identification of eligible children, the location of services, and the types of special education services to be provided. Almost two-thirds of the private schools reported receiving no information from their public school district about referring students for *IDEA* eligibility. Just over half of private schools reported the public school district contacted

them about *IDEA* services. More than half of private schools assisted public school districts in identifying *IDEA* eligible students. The vast majority of private schools were located in public school districts that reported conducting a child find process to identify *IDEA* eligible students at private schools. Public school district staff overwhelmingly determined *IDEA* eligibility for private school students and, indeed, tended to identify more eligible students than private schools reported referring.

References

Altshuler, Sandra J., and Sandra Kopels (2003). "Advocating in Private Schools for Children With Disabilities: What's New With *IDEA*?" in *Social Work*, Vol. 48, Issue 3: 320-329.

Broughman, Stephen P., and Nancy L. Swaim (2006). *Characteristics of Private Schools in the United States: Results From the 2003-2004 Private School Universe Survey* (NCES 2006-319). Washington, D.C.: U.S. Department of Education, National Center for Educational Statistics.

Rubenstein, Michael G., Keith S. Gayler, and Bruce M. Haslam (1998). *Title I Services for Private School Students Under the Reauthorization of ESEA: A Snapshot of Federal Assistance in Transition*. Washington, D.C.: U.S. Dept of Education, Office of the Under Secretary.

U.S. Department of Education, Consolidated State Performance Report for State Formula Grant Programs Under the *Elementary and Secondary Education Act* as amended by the *No Child Left Behind Act of 2001*, OMB number:1810-0614, Section III, School Choice and Supplemental Educational Services. Washington, D.C., 2004.

Stullich, Stephanie, Brenda Donly, Simeon Stolzberg (1999). *Targeting Schools: Study of Title I Allocations Within School Districts*. Washington, D.C.: U.S. Department of Education, Office of the Under Secretary, Planning and Evaluation Service.

Appendix A—Detailed Tables

Exhibit A-1 Total Private School Students Participating in Title I, Part A, 1979–2006

Year	Number of Students			
1979–80	189,100			
1980-81	213,500			
1981-82	184,000			
1982–83	177,200			
1983–84	190,700			
1984–85	184,500			
1985–86	127,900			
1986–87	137,900			
1987–88	136,600			
1988–89	137,700			
1989–90	151,900			
1990–91	157,400			
1991–92	163,300			
1992–93	171,200			
1993–94	177,200			
1994–95	173,000			
1995–96	170,500			
1996–97	167,600			
1997–98	188,200			
1998–99	197,400			
1999–2000	183,900			
2000-01	201,600			
2001-02	195,600			
2002-03	188,000			
2003-04	188,600			
2004–05	164,400			
2005–06	191,100			

Source: U.S. Department of Education, Consolidated State Performance Report for State Grant Programs under the *Elementary and* Secondary Education Act (2004).

Exhibit A-2 Characteristics of Public School Districts Serving Private Schools, 2004–05

Descriptive Characteristic

	Students Living in Poverty ^a	Central City	Urban Fringe/ Large Town	Rural/ Small Town	Average Daily Attendance	Total Revenue per Student	Number of Private Schools
Public school district with private schools	13	8	46	45	6,676	\$9,635	5
Public school district context of average private school	15	32	46	22	88,248	\$9,768	75
Public school district nationally	15	9	27	64	3,131	\$8,041	

Note: ^a Percent of children age 5-17 living below poverty level. "Public school district context of the average private school" should be interpreted to mean that on average, private schools were located in a district where 15 percent of students lived in poverty. Blank cell indicates that the category was not applicable.

Source: CCD 2003-04; PSS 2003-04; Public School District Survey #1 (n=587).

Exhibit A-3
Private School Characteristics, 2003–04 and 2004–05

		School Universe ey Data	Surve	y Data
	Private Schools	Private School Students	Private Schools	Private School Students
	(Percent	of Total)	(Percent	of Total)
Religious affiliation				
Catholic	29	48	32	45
Other Religious	44	35	40	32
Nonsectarian	27	18	29	23
Urban setting				
Central City	42	34	41	34
Urban Fringe/Large Town	45	44	46	46
Rural/Small Town	13	21	13	17
Grades served				
Elementary	70	57	68	60
Secondary	9	16	9	13
Combined	22	27	23	28
Coeducational				
Female only	2	4	1	2
Male only	2	4	2	4
Coeducational	96	92	97	94
Racial/Ethnic background (majority of students attending)				
Hispanic	4	5	5	5
White, not Hispanic	85	87	86	87
Black, not Hispanic	9	6	7	5
American Indian or Alaska Native	0	0	1	1
Asian or Pacific Islander	1	2	2	2

Note: For all of the tables disaggregated by religion, enrollment, and urban location, this identifying information comes from private school survey questions 21 and 23 and from CCD or PSS data. Survey sample drawn from 2001/02 NCES Private Schools Data.

Source: PSS, 2003–04; CCD 2003–04; Private School Survey #21.

Exhibit A-4 Private Schools With at Least One Participant in Federal Education Programs, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town
IDEA	43	62*	30	39*	40	44	44
Title I, Part A	16	37*	7	6	20*	12	17
Reading First	6	12*	3	2	6	5	7
Even Start	1	1	0	0	1	0	1
Migrant Education	0	1	0	1	0	0	0
Improving Teacher Quality State Grants	20	42*	13	4*	21	17	24*
Mathematics and Science Partnership	5	13*	2	2	6	6	3
Educational Technology State Grants	16	37*	9	4*	19	15	15
English Language Acquisition	3	6*	1	1	2	3	2
Safe and Drug-Free Schools and Communities State Grants	19	45*	9	5*	20	19	18
21st-Century Community Learning Centers	2	5*	0	0	3	1	1
State Grants for Innovative Programs	20	43*	12	6*	22	17	21

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^.

Source: Private School Survey #2, #11 (n=1,121).

Exhibit A-5 Private Schools With ESEA Program Participants, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town	Average Daily Enrollment
ESEA program participants	44	80*	28	25	49*	41	41	237

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^.

Source: Private School Survey #1, #23 (n=1,121).

Exhibit A-6 Percent of Students Participating in *ESEA* **Programs by Private School Enrollment Size**

		Private Schoo	ol Student Ei	nrollment Size	e	
	0-99	100-199	200-299	300-399	400+	-
Title I, Part A	4	4	3	1	1	-
Reading First	2	2	1	1	0	
Educational Technology State Grants	2	6	8	5	4	
Safe and Drug-Free Schools and Communities State Grants	4	15	12	9	10	
State Grants for Innovative Programs	4	10	13	10	6	

Source: Private School Survey #11 (n=1,121).

Exhibit A-7

ESEA Program Participation Rate of Students at Private Schools With ESEA

Participants by Private School Enrollment

	Private School Student Enrollment						
	0-99	100-199	200-299	300-399	400+		
Title I, Part A	36	19	15	10	11		
Reading First	33	20	33	9	11		
Educational Technology State Grants	42	39	31	34	25		
Safe and Drug-Free Schools and Communities State Grants	63	69	69	61	62		
State Grants for Innovative Programs	50	49	57	48	46		

Source: Private School Survey #11 (n=477 private schools with ESEA participants).

Exhibit A-8 Reasons Private Schools Did Not Have Participants in *ESEA* Programs, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town
Private schools did not participate	56	20	72	75	51	59	59
Reasons for not participating							
Conscious decision not to participate	58	54	63	51*	54	56	68*
No knowledge of any federal education programs under <i>ESEA</i>	40	29	39	45	41	40	39
Contacted public school districts to inquire about these programs, but got no response	8	15	5	9	7	10	3

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. Source: Private School Survey #1 (n=1,121).

Exhibit A-9
Reasons Private Schools Did Not Have Student Participants in Title I, Part A, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town
Students did not participate	58	47	72	74	54	65	51
Reasons students did not participate							
No students resided in a participating public school Title I attendance area	27	28	27	26	23	30	25
No students residing in a Title I attendance area generated funds	32	43*	22	23	27	41	13*
No students residing in a Title I attendance area were educationally needy	50	58	45	42	42	54	53
School chose not to participate	44	45	49	34	41	44	49
Parents preferred that their children not participate	15	11	17	19	15	12	21
Other	29						

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. Blank cells indicate that categories were not applicable for these subgroups.

Source: Private School Survey #13 (n=477 private schools with ESEA program participants).

		Percent of Public School Districts					Percent of Private Schools Located in Public School Districts				
	Participa	tion Rate b	y Group ^a	District Received Don't		Participation Rate by Group ^a			District Received	Don't	
	Students	Teachers	Parents	No Know Structure Structur	Students	Teachers	Parents	No Funding	Know		
Title I, Part A	35	20	14	24	57	53	34	27	15	41	
Reading First	1	1		72	53	9	11		56	49	
Even Start	0		0	75	52	1		2	60	55	
Migrant Education		0		72	55		0		63	53	
Improving Teacher Quality State Grants		31		23	64		45		15	52	
Mathematics and Science Partnership		1		74	52	0	4		64	50	
Educational Technology State Grants	15	19		28	71	27	29		20	59	
English Language Acquisition	5	4		49	72	19	12		30	68	
Safe and Drug-Free Schools and Communities State Grants	22	20		25	70	33	32		17	58	
21st-Century Community Learning Centers	3			67	58	4			54	60	
State Grants for Innovative Programs	27	22		24	63	43	33		16	50	

Note: ^a Where districts provided participation information. "Percent of private schools located in public school districts" should be interpreted to mean that 53 percent of private schools were located in a district where at least one private school student received Title I, Part A services. Blank cells indicate that categories were not applicable for these subgroups.

Source: Public School District Survey #12 (n=587).

Exhibit A-11
Types of *ESEA* Program Services Provided for Private School Participants, 2004–05

Percent of Public School Districts

·	Provided	Ту	pe of Services	Where District	Provided Service	es
	Services	Professional Development	Parental Involvement	Instructional Services to Students	Equipment or Materials	Other
Title I, Part A	45	63	60	87	65	9
Reading First	4	99	29	60	55	6
Even Start	3	63	98	89	66	10
Migrant Education	2	55	68	70	55	13
Improving Teacher Quality State Grants	50	89	5	26	39	6
Mathematics and Science Partnership	2	73	0	1	26	3
Educational Technology State Grants	38	75	6	27	69	4
English Language Acquisition	15	51	30	63	49	16
Safe and Drug-Free Schools and Communities State Grants	42	58	29	58	61	15
21st-Century Community Learning Centers	7	20	34	75	50	23
State Grants for Innovative Programs	50	51	11	41	68	8

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Public School District Survey #11 (n=587).

continued...

Exhibit A-11 ESEA Program Services for Private School Participants, 2004–05 (Cont.)

Percent of Private Schools Located in Public School Districts

	Provided	ту	pe of Services	Where District	Provided Service	es
	Services	Professional Development	Parental Involvement	Instructional Services to Students	Equipment or Materials	Other
Title I, Part A	62	76	75	91	79	10
Reading First	17	96	32	53	60	9
Even Start	4	61	84	75	62	31
Migrant Education	6	32	83	75	31	23
Improving Teacher Quality State Grants	68	95	5	21	47	4
Mathematics and Science Partnership	6	75	0	37	53	10
Educational Technology State Grants	51	82	8	32	76	3
English Language Acquisition	32	59	24	54	53	14
Safe and Drug-Free Schools and Communities State Grants	60	65	42	53	63	14
21st-Century Community Learning Centers	10	20	59	84	30	20
State Grants for Innovative Programs	65	45	14	36	77	6

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses. "Percent of private schools located in public school districts" should be interpreted to mean that 62 percent of private schools were located in a district that reported providing Title I, Part A, services.

Source: Public School District Survey #11 (n=587).

Exhibit A-12
Percent of Private Schools With Participants Receiving *ESEA* Program Services, 2004–05

	Private Schools	Туре	e of Service Rec	ceived by Priva	te School Recipi	ients
	Where Participants Received Services	Professional Development	Parental Involvement	Instructional Services to Students	Equipment or Materials	Other
Title I, Part A	39	33	27	79	54	3
Reading First	14	32	16	71	47	3
Even Start	1					
Migrant Education	1					
Improving Teacher Quality State Grants	48	93	3	4	20	1
Mathematics and Science Partnership	13	85	8	19	49	0
Educational Technology State Grants	39	57	4	15	62	3
English Language Acquisition	6	32	22	60	46	0
Safe and Drug-Free Schools and Communities State Grants	46	40	18	53	53	9
21st-Century Community Learning Centers	4	50	11	39	44	11
State Grants for Innovative Programs	48	32	6	23	74	5

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses. Blank cells indicate insufficient receipt of services (n<20).

Source: Private School Survey #11 (n=477 private schools with ESEA program participants).

Exhibit A-13
Title I, Part A, Parental Involvement Activities, 2004–05

	As Reported by Private Schools:	As Reported by Pul	olic School Districts:
	Percent of Private Schools	Percent of Public School Districts	Percent of Private Schools Located in Public School Districts
Parent newsletter	49	52	50
Parent meetings	52	71	81
Parenting classes and workshops	54	43	64
Parent-teacher conferences	51	72	79
Take home materials or books	49	66	76
Summer activity kits	50	24	32
Any of the above	84	92	94

Note: "Percent of private schools located in public school districts" should be interpreted to mean that 50 percent of private schools located in districts that allocated funds for Title I, Part A, services for private school participants, were in a district that provided parent newsletters.

Source: Public School District Survey #17 (n=320 public school districts that allocated funds for Title I, Part A, services for private school participants); Private School Survey #15 (n=188 private schools with participants receiving Title I, Part A, services).

Exhibit A-14
Title I, Part A, Professional Development Activities, 2004–05

	As Reported by Private Schools:	As Reported by Pub	olic School Districts:
	Percent of Private Schools	Percent of Public School Districts	Percent of Private Schools Located in Public School Districts
Professional development at private school	49	27	40
Professional development at public school	53	61	60
Professional development - third-party provider	49	50	57
Payment for graduate courses	42	9	11
Payment for workshops and conferences	50	55	55
Any of the above	83	88	93

Note: "Percent of private schools located in public school districts" should be interpreted to mean that 40 percent of private schools located in a district that allocated funds for Title I, Part A, services for private school participants, were in a district that provided professional development at a private school site.

Source: Public School District Survey #18 (n=320 public school districts that allocated funds for Title I, Part A, services for private school participants); Private School Survey #15 (n=188 private schools with participants receiving Title I, Part A, services).

Exhibit A-15 Public School District Allocation of Title I, Part A, Funds, 2004–05

As Reported by Public School Districts:

		Percent	of Public Scho	ool Districts		Percent of Private Schools Located in Public School Districts					
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^	
District provides services to private school participants	44	40	45	54*	41	64	79*	56	76*	42	
How funds were allocated											
Distributed on a school-by-school basis based on the number of students generating funds	78	80	78	84	76	73	67	78	73	74	
Funds combined and services provided to students most at risk	28	41	24	26	29	45	67*	28	50*	29	
Other	6					5					

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 64 percent of private schools were located in a district that provided Title I, Part A, services.

Source: Public School District Survey #14 (n=587).

Exhibit A-16 Private School Student Participation in Title I, Part A, Services During Nonschool Hours, 2004–05

As Reported by Public School Districts:

		Percent	of Public Scho	ool Districts		Percent of Private Schools Located in Public School Districts					
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^	
Private school students <i>participated</i> in Title I services during nonschool hours	37	39	36	41	35	56	73*	44	66*	29	
Private school students did not participate in Title I services during nonschool hours	63	61	64	59	65	44	27*	56	34*	71	
Reasons students did not participate											
Extended time services were offered, but private school students did not participate	30	37	28	44*	25	36	45	33	42	28	
Extended time services were not offered to private school students	42	47	41	56*	36	46	52	44	53*	36	
Extended time services were not offered to public or private school students	44	15*	51	12*	56	32	10*	40	20*	50	

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Percent of private schools located in public school districts" should be interpreted to mean that 56 percent of private schools located in districts that allocated funds for Title I, Part A, services for private school participants, were in a district where private school students participated in Title I services during nonschool hours.

Source: Public School District Survey #16 (n=320 public school districts that allocated funds for Title I, Part A, services for private school participants).

Exhibit A-17 Location and Provider of Title I, Part A, Services, 2004–05

		Percent	of Public Scho	ol Districts		Percent of Private Schools Located in Public School Districts					
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^	
At private school with a district teacher	49	58	46	47	50	58	74*	48	63*	46	
At private school with a third- party provider	28	29	28	37	24	40	41	39	42	34	
At private school in a computer- assisted lab	16	28*	13	31*	9	33	53*	20	40*	13	
At private school in a mobile van unit	10	18	7	12	8	14	21	8	15	10	
At public school with a district teacher	14	8	15	5*	17	6	3	7	3*	12	
Other	16					15					

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 58 percent of private schools located in districts that provided Title I, Part A, services for private school participants, were in a district that provided these services at a private school site with a district teacher. Source: Public School District Survey #15 (n=320 public school districts that allocated funds for Title I, Part A, services for private school participants).

Exhibit A-18
Reasons Public School Districts Did Not Allocate Title I, Part A, Funds for Services for Private School Participants, 2004–05

		Percent	of Public Scho	ool Districts		Percent of Private Schools Located in Public School Districts				
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^
District did not provide funds for services to private school participants	56	60	55	46*	59	36	21*	44	24*	58
Reason no funds were allocated										
No private school students in district generated funds	32	23	34	22	35	29	19	31	24	33
No private school students in district failing or at risk of failing to meet educational standards	20	15	21	15	21	20	15	22	19	21
Private school officials did not respond to request for information to identify students needing services	34	38	33	45	31	39	42	38	45	34
Private school officials declined the offer of Title I services	71	76	70	86*	67	77	85	75	82	74
Other	19					11				

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 36 percent of private schools located in districts that received Title I, Part A, funds, were in a district that did not allocate Title I funds for services for private school participants.

Source: Public School District Survey #14 (n=481 public school districts that received Title I, Part A, funds).

Exhibit A-19 *IDEA* Services, 2004–05

	As Repo	orted by Private	Schools:	,		eported by Pub	lic School Dis	tricts:	
-	Perce	ent of Private Sc	chools	Percent	of Public School	Districts	Percent of Private Schools Located in Public School Districts		
-	IDEA	Type of Servi	ces Provided	IDEA	Type of Servi	Services Provided	IDEA	Type of Services Provide	
	Services Provided	Direct Service	Consultative Service	Services Provided	Direct Service	Consultative Service	Services Provided	Direct Service	Consultative Service
Special education instructional services	34	26	8	78	63	15	81	63	19
Audiology services	17	14	4	29	21	8	39	30	9
Counseling, including rehabilitation counseling	9	7	3	13	10	3	20	16	3
Medical services	5	4	1	10	7	4	14	11	3
Occupational therapy	17	14	3	47	40	7	45	47	8
Orientation and mobility services	3	3	1	14	11	3	20	17	3
Physical therapy	8	6	2	32	27	5	42	36	6
Recreation, including therapeutic recreation	3	2	1	3	3	0	4	3	1
School nurse services	15	13	2	20	17	4	23	18	5
Social work services	8	5	3	16	10	6	20	16	4
Speech-language	45	41	4	92	86	6	91	86	5
Equipment	14			28			37		
Transportation	19			47			44		
Assistive technology	11			30			41		

Note: "Percent of private schools located in public school districts" should be interpreted to mean that 81 percent of private schools located in districts that provided *IDEA* services for private school participants, were in a district that reported providing special education instructional services through *IDEA* to private school participants. Blank cells indicate that the service categories were not applicable.

Source: Private School Survey #9 (n=1,121); Public School District Survey #7 (n=436 public school districts providing *IDEA* services for private school participants).

Exhibit A-20 Location of *IDEA* Services, 2004–05

	Electron of 12 211 Set vices, 2001 oc												
	I	As Reported b	y Private Scho	ools:	As Reported by Public School Districts:								
		Percent of	Private School	s	Percent	of Public Scho	ool Districts	Percent of Private Schools Located in Public School Districts					
	Overall Catholic Other Religious^ Nonsectarian				Overall	Large District	Small District^	Overall	Large District	Small District^			
At private school	43	51*	32	48*	62	62	62	61	62	61			
At a public school or district site	47	53	46	41	74	82*	69	82	85*	73			
Other	10				6			18					

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 61 percent of private schools located in districts that provided *IDEA* services for private school participants, were in a district that provided *IDEA* services at a private school site.

Source: Private School Survey #10 (n=455 private schools with participants receiving *IDEA* services); Public School District Survey #18 (n=436 public school districts that provided *IDEA* services for private school participants).

Exhibit A-21 Reasons Public School Districts Did Not Provide *IDEA* Services for Eligible Private School Students, 2004–05

As Reported by Public School Districts:

		Percent	of Public Scho	ol Districts		Percent of Private Schools Located in Public School Districts					
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^	
Districts with <i>IDEA</i> eligible students	79	78	79	96*	73	89	90	88	96*	76	
Districts with <i>IDEA</i> eligible students that did not provide <i>IDEA</i> services	11	11	11	6*	18	8	4	8	19*	3	
Reason districts did not provide services											
Lack of transportation	0					0					
IDEA funds were inadequate	3	3	3	6	2	10	16	9	13	9	
Parents declined services	61	68	60	29	65	59	47	62	38	65	
Other ⁺	53					56					

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Percent of private schools located in public school districts" should be interpreted to mean that 89 percent of private schools were located in a district with IDEA eligible private school students.

⁺ Common reasons given by public school districts for not providing services include private schools declined services, no requests from private schools, the intermediate unit provides these services, and not required per IEP. "Other" subgroup analysis not appropriate due to the diversity of responses. Blank cells in the "Lack of Transportation" row indicate that subgroups did not report lack of transportation as a reason for not providing *IDEA* services. Source: Public School District Survey #7 (n=587).

Exhibit A-22 Reasons Public School Districts Provided *IDEA* Services to Some But Not All Eligible Private School Students, 2004–05

As Reported by Public School Districts:

		Percent	of Public Scho	ool Districts		Percent of Private Schools Located in Public School Districts					
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^	
Districts provided <i>IDEA</i> services to some but not all eligible private school students	38	46	35	62*	25	61	71	55	73*	30	
Reasons not all <i>IDEA</i> eligible students received services											
Parents declined services	81	85	80	85	76	88	95	83	89	80	
IDEA funds were inadequate to serve all children identified in the child find process	29	19	34	34	23	34	34	34	36	21	
Other	18					14					

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 61 percent of private schools were located in a district that provided *IDEA* services to some but not all eligible private school students.

Source: Public School District Survey #9 (n=587).

Exhibit A-23
Private School Notification of *IDEA* Services and Referral Procedures, 2004–05

	As Reported by Private Schools:
	Percent of Private Schools
Received information from public school district regarding <i>IDEA</i> services	53
Received information about the referral of <i>IDEA</i> eligible students	45

Source: Private School Survey #3, #7 (n=1,121).

Exhibit A-24
Average Number of Parentally Placed Private School Students Identified by Public School Districts and Referred by Private Schools for Special Education Services, 2004–05

	In Schools In Which Students Do Not Receive IDEA Services	In Schools In Which Students Receive <i>IDEA</i> Services
Identified by public school district	4	13
Referred to public school district by private school	1	5

Source: Private School Survey #4, #5 (n=1,121).

Exhibit A-25
Evaluators Used to Determine Private School Student *IDEA* Eligibility, 2004–05

		Percent	of Public Scho	ol Districts		Percent	n Public Scho	ol Districts		
	Overall	Overall High Poverty Low Poverty^ Large District Small District					High Poverty	Low Poverty^	Large District	Small District^
Public school staff	86	85	86	97*	82	91	93	91	97*	81
Contracted third-party	33	29	34	23*	82	30	36	28	26	37
Other	12					16				

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 91 percent of private schools were located in a district that used public school staff to determine private school student *IDEA* eligibility. Source: Public School District Survey #5 (n=587).

Exhibit A-26 Child Find Procedures Used to Locate and Identify Private School Students Eligible for *IDEA* Services, 2004–05

As Reported by Public School Districts:

		Percent	of Public Scho	ool Districts		Percent of Private Schools Located in Public School Districts					
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^	
Mass mailing to all households in public school attendance area	31	19*	34	24	33	24	15	29	18*	34	
Radio or TV public service announcements	26	28	26	36*	23	31	35	29	35*	23	
Information on district website	54	40*	59	59	53	66	67	66	73*	55	
Distribution of informational brochures	56	57	56	72*	50	68	74	65	75*	55	
Presentation at private schools	29	28	29	38*	26	42	51	38	50*	28	
Outreach at community events	39	41	38	48*	36	48	58	43	54*	38	
Outreach to private schools	72	72	72	86*	67	81	87	78	88*	69	
Other	47					48					

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 24 percent of private schools were located in a district that used mass mailing to all households as a child find procedure.

Source: Public School District Survey #4 (n=587).

Exhibit A-27 Assistance from Private Schools in Identifying Private School Students Eligible for *IDEA* Services, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town
Provided mailing list of all parents	11	15*	10	8	9	9	17*
Provided district contact info for parents of students with suspected disabilities	43	62*	36	32	44	43	42
Organized parent information session	18	23*	14	17	19	17	18
Referred parents and/or students to the district's <i>IDEA</i> representative	37	52*	32	26	35	36	42
The district did not ask for assistance with child find activities	42	37	42	47	42	43	38
Other	8						
Overall assistance rate	51	69*	42	43	50	50	53

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. Source: Private School Survey #6 (n=1,121).

Exhibit A-28
Timely and Meaningful *ESEA* Program Consultation, 2004–05

	A	As Reported b	y Private Scho	ools:		As Ro	eported by Pu	blic School I	Districts:		
	Percent of Private Schools				Percent	of Public Scho	ool Districts		Percent of Private Schools Located in Public School Districts		
	Overall	Catholic	Other Religious^	Nonsectarian	Overall	Large District	Small District^	Overall	Large District	Small District^	
Title I, Part A	92	94	90	84	97	98*	97	99	99	98	
Reading First	80				78			88			
Even Start	100				42			68			
Migrant Education	74				61			70			
Improving Teacher Quality State Grants	87	85	88	92	91	93*	90	93	95	89	
Mathematics and Science Partnership	90				64			85			
Educational Technology State Grants	80	80	76	86	84	91*	81	92	95*	85	
English Language Acquisition	72				70			89			
Safe and Drug-Free Schools and Communities State Grants	90	89	92	93	89	89*	89	94	95	89	
21st-Century Community Learning Centers	66				48			78			
State Grants for Innovative Programs	86	85	84	100*	86	87*	86	93	95	89	

Note: Statistically significant differences are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Blank cells indicate insufficient provision of services or participation to provide subgroup analysis (n<50). "Percent of private schools located in public school districts" should be interpreted to mean that 99 percent of private schools located in districts providing Title I, Part A, program services for private school participants, were in a district that reported conducting timely and meaningful consultation regarding the program.

Source: Private School Survey #18, #19 (n=477 private schools with participants in the given program); Public School District Survey #19, #20 (n=587 public school districts providing given program services for private school participants).

Exhibit A-29
Private Schools With Participants in *ESEA* Programs That Reported Public School Districts Engaged in Timely and Meaningful Consultation With Private School Officials, 2004–05

Percent of Private Schools

_		
	Program Consultation Took Place	Private Schools Where Consultation Took Place That Had Participants in Program
Title I, Part A	71	51
Reading First	28	45
Even Start	8	16
Migrant Education	6	13
Improving Teacher Quality State Grants	56	83
Mathematics and Science Partnership	25	53
Educational Technology State Grants	47	77
English Language Acquisition	14	33
Safe and Drug-Free Schools and Communities State Grants	59	79
21st-Century Community Learning Centers	12	27
State Grants for Innovative Programs	59	81

Source: Private School Survey #18, #19 (n=477 private schools with ESEA program participants).

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Exhibit A-30 Private School Officials Engaging in *ESEA* Consultation, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town
Consultation took place	72	84*	71	42*	69	72	80
Private school officals engaging in consultation							
Administrators at the diocesan or association level	49	58*	34	30	62*	41	43
Administrators at the school level	89	89	89	91	84*	92	91
Other	17						

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses.

Source: Private School Survey #17 (n=477 private schools with ESEA program participants).

Exhibit A-31 Reasons *ESEA* Consultation Did Not Take Place, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town
Consultation <i>did not</i> take place	28	16	29	58	31	28	20
Reason consultation did not take place							
Chose not to participate	28	21*	48	13*	14	24	62*
Association or diocesan administrators decided not to participate	4	4	11	0	4	6	0
School district did not contact private school officals	64	61	52	73	84*	57	43
Other	13						

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. Source: Private School Survey #17 (n=477 private schools with *ESEA* program participants).

Exhibit A-32
Title I, Part A, Timely and Meaningful Consultation, 2004–05

	As Reported by Private Schools:	As Reported by Pul	blic School Districts:
	Percent of Private Schools	Percent of Public School Districts	Percent of Private Schools Located in Public School Districts
Consultation took place	92	84	91
Private school officials engaging in consultation			
Private school organization	44	26	47
Private school administrators	94	97	97

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses. "Percent of private schools located in public school districts" should be interpreted to mean that 91 percent of private schools located in districts that received Title I, Part A, funds, were in a district that reported conducting timely and meaningful consultation about the program.

Source: Private School Survey #18 (n=188 private schools with participants that received Title I, Part A, services); Public School District Survey #19 (n=481 public school districts that received Title I, Part A, funds).

Exhibit A-33
Barriers to Timely and Meaningful *ESEA* Consultation, 2004–05

		As R	eported by	Private Sch	ools:		As Rep	orted by Pul	blic School	Districts:	
		Po	Percent of Private Schools				Public Scho	ool Districts	Percent of Private Schools Located in Public School Districts		
		Overall	Catholic	Other Religious^	Non- sectarian	Overall	Large District	Small District^	Overall	Large District	Small District^
District's limited understanding of or	Major Barrier	9	10	6	9	4	3	4	3	2	6
experience with equitable participation requirements of <i>ESEA</i>	Somewhat of a Barrier	19	19	15	21	9	7	10	8	6	11
Difficulty coordinating internally in the	Major Barrier					2	1	2	2	1	3
	Somewhat of a Barrier					5	4	6	6	7	4
Inadequate information about with	Major Barrier					2	1	3	2	1	4
whom to consult in private schools	Somewhat of a Barrier					5	4	5	4	3	7
Lack of assistance from private schools	Major Barrier					13	16	12	10	9	11
in identifying needs of their students and teachers	Somewhat of a Barrier					9	9	9	12	11	14
Absence of district procedures and	Major Barrier	12	12	11	14	2	1	2	1	1	2
policies relating to the equitable participation requirement	Somewhat of a Barrier	17	18	16	16	3	1	4	4	4	4
Limited communication from the public	Major Barrier	15	14	12	22						
school district	Somewhat of a Barrier	20	20	18	20						
Lack of timely and meaningful	Major Barrier	14	15	8	21						
consultation with the district	Somewhat of a Barrier	16	16	12	22						

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). Blank cells indicate that a given barrier is not applicable for either private schools or public school districts. "Percent of private schools located in public school districts" should be interpreted to mean that 3 percent of private schools were located in a district that reported its limited understanding of or experience with the equitable participation requirements of *ESEA* was a "major barrier" to conducting consultation.

 $Source: Private School Survey \#20 \ (n=477 \ private schools \ with \textit{ESEA} \ program \ participants); Public School District Survey \#21 \ (n=587).$

Exhibit A-34
ESEA Program Consultation Topics, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	C K C			Topics Cov	ered During C	onsultation		
		Needs of Students	Professional Development	Amount of Funding Available	Types of Services	Service Provider	Assessment of Services	Service Location
Reading First	80	87	64	80	88	67	67	74
Even Start	100	79	54	71	75	48	48	54
Migrant Education	74	68	44	70	80	47	49	55
Improving Teacher Quality State Grants	87	50	90	83	74	53	43	56
Mathematics and Science Partnership	90	69	87	81	75	54	53	54
Educational Technology State Grants	80	67	78	87	75	56	49	54
English Language Acquisition	72	86	59	72	80	68	63	66
Safe and Drug-Free Schools and Communities State Grants	90	79	66	84	77	61	52	53
21st-Century Community Learning Centers	66	65	62	82	66	44	49	44
State Grants for Innovative Programs	86	69	64	92	78	54	51	50

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses. Source: Private School Survey #19 (n=477 private schools with *ESEA* program participants).

continued...

Exhibit A-34
ESEA Program Consultation Topics, 2004–05 (Cont.)

Percent of Public School Districts

	Consultation			Topics Cove	ered During Co	onsultation		
	Occurred	Needs of Students	Professional Development	Amount of Funding Available	Types of Services	Service Provider	Assessment of Services	Service Location
Reading First	78	85	63	67	78	53	54	57
Even Start	42	81	27	36	64	54	31	45
Migrant Education	61	87	54	65	83	60	62	56
Improving Teacher Quality State Grants	91	50	90	80	77	47	38	54
Mathematics and Science Partnership	64	57	75	75	64	33	31	35
Educational Technology State Grants	84	66	79	81	77	46	41	51
English Language Acquisition	70	81	61	65	73	49	48	51
Safe and Drug-Free Schools and Communities State Grants	89	75	65	83	78	50	44	48
21st-Century Community Learning Centers	48	73	32	70	82	67	43	72
State Grants for Innovative Programs	86	71	68	84	75	46	46	48

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses.

Source: Public School District Survey #20 (n=587 public school districts providing given program services for private school participants). continued...

Exhibit A-34
ESEA Program Consultation Topics, 2004–05 (Cont.)

Percent of Private Schools Located in Public School Districts

	Consultation			Topics Cove	ered During Co	onsultation		
	Occurred	Needs of Students	Professional Development	Amount of Funding Available	Types of Services	Service Provider	Assessment of Services	Service Location
Reading First	88	83	84	79	89	70	71	71
Even Start	68	67	37	49	86	56	45	59
Migrant Education	70	83	58	65	87	62	59	63
Improving Teacher Quality State Grants	93	59	95	87	85	60	53	66
Mathematics and Science Partnership	85	75	77	80	83	62	56	70
Educational Technology State Grants	92	70	89	84	86	59	54	62
English Language Acquisition	89	88	76	75	83	64	67	64
Safe and Drug-Free Schools and Communities State Grants	94	83	79	85	88	64	59	64
21st-Century Community Learning Centers	78	86	43	62	84	73	47	70
State Grants for Innovative Programs	93	81	68	90	83	59	57	61

Note: Numbers sum to more than 100 percent because respondents could mark multiple responses. "Private schools located in public school districts" should be interpreted to mean that 88 percent of private schools located in districts with private school participants in Reading First, were in a district that reported conducting timely and meaningful consultation regarding the program.

Source: Public School District Survey #20 (n=587 public school districts providing given program services for private school participants).

districts that received Title I, Part A, funds).

Exhibit A-35
Title I, Part A, Consultation Topics, 2004–05

			y Private Scho	ools:	•	,	eported by Pu	blic School I	Districts:	
,		Percent of	Private School	ls	Percent	of Public Scho	ool Districts		Private School Di	ols Located in stricts
	Overall	Catholic	Other Religious^	Nonsectarian	Overall	Large District	Small District^	Overall	Large District	Small District^
Consultation occurred	92	94	90	84	97	98	97	99	99	98
Of districts and private schools reporting consultation										
Number of private school students generating Title I funds	73	78	68	61	80	91*	76	89	96	76
Administrative costs	37	40	37	21	36	48*	31	50	59	32
Per-pupil allocation	61	64	60	49	70	82*	66	83	91	66
Determination to "pool" resources	45	46	48	30	33	41*	30	49	59	28
Determination of which eligible students will receive services	76	80	76	57	78	86*	75	86	94	71
Assessment of student learning needs	66	71*	58	56	65	78*	60	79	89	57
Assignment of staff who will provide services to private-school students	67	74*	55	51	54	63*	50	68	78	46
Type of services to be provided	83	87	77	76	81	87	79	88	94	78
Location of services	76	81*	68	67	75	82*	72	83	91	67
Challenging student performance standards	41	46*	32	36	48	63*	42	64	77	39
Assessment methods of students' progress in meeting standards	48	52	40	41	55	70*	49	71	82	47
Professional development of private school teachers of Title I, Part A, participants	48	47	49	50	60	76*	54	73	84	52
Activities for private school parents of Title I, Part A, participants	41	41	41	36	52	66*	47	66	78	42

Note: Statistically significant differences between general private school response and general public school district response indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Percent of private schools located in public school districts" should be interpreted to mean that 99 percent of private schools located in districts that received Title I, Part A, funds, were in a district that reported conducting timely and meaningful consultation regarding the program.

Source: Private School Survey #18 (n=188 private schools with Title I, Part A, participants); Public School District Survey #19 (n=481 public school

Exhibit A-36 Documentation of *ESEA* Consultation, 2004–05

	As Reported by Private Schools That Have Participants in ESEA Programs Percent of Private Schools	As Reported by Public School Districts:	
		Percent of Public School Districts	Percent of Private Schools Located in Public School Districts
Letter of intent to participate in <i>ESEA</i> programs sent by districts; received by private schools	72	78	87
Maintenance of Written Records of Consultation			
Title I		81	89
Other ESEA programs		73	83
Use of sign-off form			
Title I		72	82
Other ESEA programs		65	77

Note: Blank cells indicate that categories were not applicable for these subgroups. "Percent of private schools located in public school districts" should be interpreted to mean that 87 percent of private schools were located in a district that sent a letter of intent to participate in *ESEA* programs.

Source: Private School Survey #16 (n=477 private schools with *ESEA* program participants); Public School District Survey #22, #23, #24 (n=587).

Exhibit A-37 *IDEA* Consultation, 2004–05

	As Reported by Private Schools:	As Reported by Public School Districts:	
	Percent of Private Schools	Percent of Public School Districts	Percent of Private Schools Located in Public School Districts
Consultation occurred	38	86	92
Private school representatives engaging in consultation			
Organization	35	28	46
Administrators	49	96	97
Parents	40	53	59
Written affirmation documenting consultation	59	57	60

Note: "Percent of private schools located in public school districts" should be interpreted to mean that 92 percent of private schools were located in a district that reported conducting timely and meaningful consultation regarding *IDEA*. Source: Private School Survey #8 (n=1,121); Public School District Survey #6 (n=587).

Exhibit A-38 Private School Report of "Usefulness" of *IDEA* Consultation, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town
The identification of eligible students through the child find process	61	66*	53	63	62	60	63
Informing private school representatives about the child find process	56	63*	45	54	57	57	52
How the share of federal <i>IDEA</i> funds available for private school students was calculated	41	41	41	42	40	42	41
How the consultation process will operate throughout the school year	62	71*	53	53	65	57	69
Types of special education and related services and alternative service delivery mechanisms	61	67	58	47	66	57	63
How to distribute funds if insufficient to serve all children	33	37*	26	32	33	35	28
How and when decisions on the delivery of special education services are provided will be made	56	61*	48	56	54	55	62
Location of services	66	69	62	61	59	66	72
How district will explain reasons for not providing services when disagreeing with private school officials	44	49	37	44	47	44	42

Note: "Useful" is defined to be a response of 3 or higher on a 4 point scale ranging from 1="not useful" to 4="very useful". Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is

indicated with a ^.

Source: Private School Survey #8 (n=1,121).

Exhibit A-39 *IDEA* Consultation Topics, 2004–05

As Reported by Public School Districts:

	Percent of Public School Districts					Percent	of Private Scl	nools Located i	n Public Scho	ol Districts
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^
The identification of eligible students through the child find process	89	92	88	93	87	94	96	93	97*	87
Informing private school representatives about the child find process	88	91	87	94*	85	89	83	92	91	85
How the share of federal <i>IDEA</i> funds available for private school students was calculated	67	74	65	71	66	69	66	70	69	68
How the consultation process will operate throughout the school year	87	92	86	88	87	83	78	85	82	85
Types of special education and related services and alternative service delivery mechanisms	92	89	92	95	90	94	95	94	97*	90
How to distribute funds if insufficient to serve all children	50	55	49	57	48	54	52	56	58	47
How and when decisions on the delivery of special education services are provided will be made	88	86	88	91	86	87	81	90	87	86
Location of services	94	93	94	95	94	94	94	95	95	94
How district will explain reasons for not providing services when disagreeing with private school officials	65	68	64	73*	62	69	66	70	71	64

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^.
"Percent of private schools located in public school districts" should be interpreted to mean that 94 percent of private schools were located in a district that reported consulting about the identification of eligible students through the child find process.

Source: Public School District Survey #6 (n=587).

Exhibit A-40 Technical Assistance for Implementation of Federal Education Programs, 2004–05

	As Reported by Private Schools:				As Reported by Public School Districts:						
		Percent of I	Private School	s	Percent	of Public Scho	ool Districts		Percent of Private Schools Located in Public School Districts		
	Overall	Catholic	Catholic Other Religious^ Nonsectarian			Large District	Small District^	Overall	Large District	Small District^	
Technical assistance from the state	12	17*	7	12	75	82*	72	81	86*	73	
Districtwide private school working group	13	22*	9	8	10	20*	6	25	35*	7	
Technical assistance from U.S. Department of Education	4	8*	2	3	14	18	12	31	42*	10	
U.S. Department of Education publications	28	37*	23	24	55	77*	47	71	85*	48	
U.S. Department of Education sponsored workshops and conferences	14	17*	10	14	33	43*	30	46	56*	28	
U.S. Department of Education Web site	26	34*	19	25	56	71*	50	69	81*	47	
Other	11				20			21			

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 81 percent of private schools were located in a district that reported receiving technical assistance from the state regarding implementation of federal education programs.

Source: Private School Survey #25 (n=1,121); Public School District Survey #25 (n=587).

Exhibit A-41
Public School District Provision of ESEA Program Services for Private School Participants as Predicted by Districtwide Working Group Participation

	As Reported by Private Schools:	As Reported by Public School Districts:		
	Private Schools	Public School Districts	Private Schools Located in Public School Districts	
	Odds Ratios	Odds Ratios	Odds Ratios	
Title I, Part A	1.80*	2.00	2.51*	
Improving Teacher Quality State Grants	3.40*	3.29	3.76*	
Educational Technology State Grants	2.28*	1.87	2.54*	
Safe and Drug-Free Schools and Communities State Grants	2.69*	2.23*	2.69*	
State Grants for Innovative Programs	1.93*	1.49	2.30*	

Note: Private school model controls for location and religious affiliation. Public school district models control for location, poverty, and enrollment. Statistically significant differences in odds for private schools having *ESEA* program participants and public school districts providing services to private school participants given participation in a districtwide working group are indicated with an asterisk (Chi-squared<.05). "Private schools located in public school districts" should be interpreted to mean that private schools, on average, were located in public school districts where the odds ratio of providing Title I, Part A, progam services, given districtwide working group participation, was 2.51.

Exhibit A-42 ESEA Program Fund Allocation, 2004–05

As Reported by Public School District:

	Avera	nge Funding for P	ublic School Dis	strict	Public School District Funding for Average Private School				
	Average Total Public School District Allocation	Large Districts	Small Districts^	Average Percent of Total Set Aside for Private School Participants	Average Total Public School District Allocation	Large Districts	Small Districts^	Average Percent of Total Set Aside for Private School Participants	
Title I, Part A	\$ 1,474,999	\$ 4,837,926 *	\$ 362,865	2.0	\$ 48,181,719	\$ 76,814,245 *	\$ 461,685	1.9	
Reading First	\$ 87,143	\$ 317,002 *	\$ 11,127	0.5	\$ 3,033,671	\$ 4,846,104 *	\$ 133,002	5.0	
Even Start	\$ 10,693	\$ 32,517 *	\$ 3,476	0.0	\$ 56,151	\$ 87,241 *	\$ 4,336	0.0	
Migrant Education	\$ 19,509	\$ 57,977 *	\$ 6,788	0.0	\$ 73,519	\$ 114,295 *	\$ 5,559	0.0	
Improving Teacher Quality State Grants	\$ 349,962	\$ 1,057,424 *	\$ 116,001	2.8	\$ 7,760,288	\$ 12,330,559 *	\$ 143,306	3.3	
Mathematics and Science Partnership	\$ 3,692	\$ 13,933 *	\$ 305	0.1	\$ 44,839	\$ 71,385 *	\$ 596	0.2	
Educational Technology State Grants	\$ 39,428	\$ 126,222 *	\$ 10,725	4.0	\$ 1,042,574	\$ 1,660,553 *	\$ 12,628	6.0	
English Language Acquisition	\$ 65,723	\$ 236,766 *	\$ 9,158	1.2	\$ 2,308,802	\$ 3,685,927 *	\$ 13,635	1.3	
Safe and Drug-Free Schools and Communities State Grants	\$ 40,289	\$ 125,136 *	\$ 12,230	4.8	\$ 767,463	\$ 1,219,219 *	\$ 14,549	4.7	
21st-Century Community Learning Centers	\$ 52,894	\$ 149,065 *	\$ 21,089	1.0	\$ 247,087	\$ 382,961 *	\$ 20,635	0.4	
State Grants for Innovative Programs	\$ 32,256	\$ 99,874 *	\$ 9,894	6.0	\$ 411,120	\$ 651,221 *	\$ 10,961	8.6	

Notes: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Source: Public School District Survey #11 (n=587).

Exhibit A-43 Title I, Part A, Allocations for Services for Private School Participants, 2004–05

Average amount of Title I funds per private school student participant	953	
Percent of private schools that know the amount of Title I funds allocated for services	38	

Source: Private School Survey #11, #14 (n=188 private schools with Title I, Part A, participants).

Exhibit A-44
Public School District Methods Used to Determine the Number of Private School Students From Low-Income Families, 2004–05

As Reported by Public School Districts:

	Percent of Public School Districts					Percent	of Private Scl	hools Located i	n Public Scho	ol Districts
	Overall	High Poverty	Low Poverty^	Large District	Small District^	Overall	High Poverty	Low Poverty^	Large District	Small District^
Used the same poverty data to identify and count low-income students in public and private schools	73	73	73	77	71	78	85	74	81	71
Extrapolated from a representative survey sample	5	6	5	6	5	6	8	5	7	5
Correlated data from two different data sources	8	11	7	9	8	9	9	9	10	7
Used proportionality ^a	16	13	17	20	15	21	20	22	25	15
Other	21					18				

Note: ^a Proportionality means that a public school district applied the low-income percentage of each participating public school attendance area to the number of private school children who reside in that private school attendance area. Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses. "Percent of private schools located in public school districts" should be interpreted to mean that 78 percent of private schools located in districts that received Title I, Part A, funds, were in a district that used the same poverty data to identify and count low-income students in both public and private schools.

Source: Public School District Survey #13 (n=481 public school districts that received Title I, Part A, funds).

Exhibit A-45 Private School Assistance With Identifying Private School Students From Low-Income Families, 2004–05

As Reported by Private Schools:

Percent of Private Schools

	Overall	Catholic	Other Religious^	Nonsectarian	Central City	Urban Fringe/ Large Town^	Rural/ Small Town
Overall assistance rate	52	65*	40	32	52	47	65*
Type of assistance provided by private schools							
Provided names and addresses of students	72	72	76	66	73	71	72
Provided family income information	49	48	51	50	44	53	50
Surveyed school's parents	56	57	52	54	47*	66	52
Provided tuition scholarship information	26	28	20	25	27	29	21
Other	27						

Note: Statistically significant differences relative to largest category subgroup are indicated with an asterisk (p<.05). The largest subgroup is indicated with a ^. Numbers sum to more than 100 percent because respondents could mark multiple responses. "Other" subgroup analysis not appropriate due to the diversity of responses.

Source: Private School Survey #6 (n=477 private schools with ESEA program participants).

Appendix B—Methodology

Sample Design and Weighting

The sample universe was created using the National Center for Education Statistics (NCES) Common Core of Data (CCD) Local Education Agency Universe File (2002–03) and the Private School Universe Survey (PSS) (2003–04). ZIP Codes were used to match private schools to public school districts. The sample of public school districts was selected prior to the sample of private schools. Public school districts were drawn at random from a list of public school districts with at least one private school. Each district was drawn with probability proportionate to the number of private schools located within district boundaries. As a result, districts with many private schools had a much greater chance of entering the sample. For the sampling, public school districts were stratified based on enrollment, free and reduced-priced lunch program participation, and number of private school students. Public school districts with only one or two private schools were further stratified by the religious affiliation of the private schools located within their boundaries. In all, 607 public school districts were selected.

This sample design allows for the description of public school districts in two different ways. The first approach is to weight the sample so that it represents a simple average of all districts with at least one private school. The original sample, with weights for large and small districts, gives any district weight proportional to the number of private schools located in the district. To construct "equal-probability" weights, the "size-based" weights were divided by the number of private schools in the sampled district. The resulting "equal-probability" weights lead to a weighted sample that equally emphasizes large and small districts with at least one private school.

The second approach takes direct advantage of having sampled districts with probability proportionate to the number of private schools in the public school district. The sampling and weighting approach depends on the number of private schools. Public school districts with 44 schools or more were included in the sample with certainty and assigned a weight that reflects their desired sampling probability (the number of private schools in their jurisdiction divided by 44). Public school districts with between three and 44 private schools were sampled with probability proportionate to the number of private schools in them, and are given a weight of 1. This group accounts for the largest share of sampled districts. Public school districts with one or two private schools were oversampled to obtain proportional representation of private schools from these public school districts in the private school sample, and were given a weight of .4 and .8, respectively. As a result of this design, only minimal weighting to the sample is needed and the public school district mean represents the average public school district context for private schools.

For ease of discussion, the results were presented using the first approach throughout the report. The results from the second method are reported in Appendix A with policy relevant differences noted throughout the report.

Private schools were randomly selected from those located in the sampled public school districts in inverse proportion to the number of private schools in the public school district. Private schools were excluded from the sample if they had fewer than 10 students, were located in a private home, or had a major role of supporting home private schooling. The resulting sample was intended to be nationally representative of private schools. In order to ensure representative data, private schools were stratified on public school district enrollment, religious affiliation, free and reduced-priced lunch program participation, and number of students. A sample of 1,501 private schools was selected. While the sample itself was nationally representative, the data were weighted to adjust for nonresponse, especially as there was a differential response rate among private schools with different religious affiliations (see below).

Questionnaire Development and Data Collection

The surveys of private schools and public school districts were developed to gather information on the range of federal education programs where public school districts are required to provide services for private school participants. A pretest of the two surveys was conducted during the summer of 2005. Nine private schools and nine public school districts participated in the pretest. After completing the survey, the private schools and public school districts participated in a one-on-one comprehensive discussion of each survey question. The results of the pretest were used to revise the questionnaires for the data collection. The questionnaire was also reviewed and approved by the U.S. Office of Management and Budget.

Data collection took place in the fall and winter of 2005–06. A series of follow-up efforts were undertaken to ensure a high level of response by public school districts and private schools. The response rate for public school districts was 98 percent. The response rate for public school districts was out of 598 eligible public school districts. Public school districts were considered ineligible if they had consolidated or had no private schools.

The response rate for private schools was 80 percent. The response rate for private schools was out of 1,409 eligible private schools. Private schools were considered ineligible if they were closed, had no K–12 students, or had no parentally placed students. For private schools, the response rate by religious affiliation was as follows: 82 percent for Catholic schools, 74 percent for other religious schools, and 75 percent for nonsectarian private schools. Appropriate weighting was used to account for the differential response rate among private schools by religious affiliation.

Description of Subgroups

Public School Districts

Urban Setting

Urban setting classifications were determined using CCD locale codes for the given district, which are assigned by the Census based on district addresses. The three urban setting classifications in this report were defined as follows:

Central City—Locale codes of (1) large city or (2) mid-size city.

Urban Fringe or Large Town – Locale codes of (3) fringe of large city, (4) fringe of mid-size city, or (5) large town.

Rural or Small Town—Locale codes of (6) small town, (7) rural outside Core Based Statistical Area or Metropolitan Statistical Area (CBSA and MSA), or (8) rural, inside CBSA or MSA.

Poverty

A district was considered "high poverty" if it fell in the top quartile of the sample universe of districts that were home to at least one private school based on the percent of children age 5-17 living below the poverty line according to Census data (above 18.1%). All other districts were considered "low poverty."

Enrollment

A district was considered "large" if it fell in the top quartile of the sample universe of districts that were home to at least one private school based on the district's total enrollment (above 5,830 students). All other districts were considered "small."

Private Schools

Urban Setting

Private schools were assigned the same urban setting as the public school district to which they were matched. See above for public school district urban setting classification definitions.

Religion

Religious affiliation was assigned based on private school survey responses. In cases where the respondent failed to answer this survey item, religious affiliation information from the Private School Survey Universe was used to classify the school. "Catholic" schools included parochial, inter-parochial, diocesan, and private schools. "Other religious" schools were those that had religious affiliations other than Catholic, while "non-sectarian" schools claimed no religious affiliation.

Analytic Techniques

Data were cleaned to reconcile contradictory answers and outlying responses before analysis began. Weights, as described above, were used in all analysis of public school district data to account for the method of sampling allowing accurate conclusions to be drawn about the overall population of public school districts that are home to private schools. Additionally, robust standard errors were used to account for clustering of results on account of the likelihood of multiple private schools being sampled from each public school district.

In the appendix tables, public school district data are differentiated by poverty, size, and metro setting. Similarly, in the appendix tables, private school results are broken down by private school religious affiliation (Catholic, other religious, and nonsectarian) and metro setting. Means difference tests were calculated to compare responses within each subcategory. In cases where there were multiple classifications in a particular category (e.g. urban setting), means were compared to the largest subgroup of that category. Specifically, in the urban location category, more private schools and public school districts were categorized as "urban fringe or large town" than any other urban classification, so all other urban setting groups were compared to the results for the "urban, fringe, or large town" group. Likewise, in the religious affiliation group for private schools, other religious schools were the comparison group.

A series of logistic regressions were used to examine the likelihood of public school district provision of federal program services and private school participant utilization of these services. One set focused strictly on private school data and looked at the effect school type had on the participation of private school participants in federal education programs. Specifically, these regressions looked at differences between elementary schools, secondary schools, and combined schools. The second set of logistic regressions used both private school and public school district data and looked at the effect of participation in a districtwide working group. All regressions that used public school district data controlled for public school district location, size, and poverty. Similarly, all regressions that used private school data controlled for school location and religious affiliation.

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²⁴ School type was defined based on the convention of the most recent NCES Private School Universe Report. That is, an elementary school may contain any grade K-6 but no grade higher than grade 8. A secondary school was any school that housed any grade 7-12 and no grade lower than 7. A combined school was one that contained any grade K-6 and any grade 9-12.

Appendix C—Survey Instruments

STUDY OF PRIVATE SCHOOL STUDENT PARTICIPATION IN FEDERAL EDUCATION PROGRAMS

U.S. DEPARTMENT OF EDUCATION POLICY AND PROGRAM STUDIES SERVICE

THE URBAN INSTITUTE WASHINGTON, DC

Survey of Private Schools

To complete this survey online go to:

www.privateschsurvey.schools.urban.org

Username: «Username» Password: «Password» Responses to this data collection will be used only for statistical purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district or individual. We will not provide information that identifies you or your district to anyone outside the study team, except as required by law.

We recommend you briefly reviewing the entire survey before trying to complete it. You may need to collaborate with individuals with specific information about federal programs, including IDEA, to obtain all of the information necessary to complete the questionnaire.

Please return your completed questionnaire to:

Ary Amerikaner Education Policy Center The Urban Institute 2100 M Street, NW Washington, DC 20037

If you have questions, please contact Ary Amerikaner at **PrivateSCHSurvey@ui.urban.org** or 1-866-859-0635.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB number. The valid OMB control number of this information collection is 1875-0236. The time required to complete this information collection is estimated to average 30 minutes per survey, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimates(s) or suggestion for improving this form, please write to: U.S. Department of Education, Washington, 20202-4651. If you have comments or concerns regarding the status of your individual submission of this form, write directly to: Policy and Program Studies Service, Office of Planning, Evaluation and Policy Development, US Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202.

O.M.B. NO. 1875-0236 • Approval Expires 08/31/2008

PART 1. PARTICIPATION IN FEDERAL EDUCATION PROGRAMS

not responded.

1. Does your school participate in any federal education programs under No Child Left Behind (NCLB), (e.g., Title IA, Title VA).

(Circle one) YESNO		1 2 -	
1a. If NO, why not?	Circle one	on each line	·
a. We have made a conscious decision not to participate.	YES	NO	
b. We have no knowledge of any federal education programs under NCLB.	YES	NO	
c. We have contacted our public school district to inquire about these programs, but the district has	YES	NO	

2. Does your school have students receiving special education benefits under the Individuals with Disabilities Education Act (IDEA), (e.g., evaluations and/or services?)

·	(Circle one)
YES	1
NO	2

PART 2. IDEA (INDIVIDUALS WITH DISABILITIES EDUCATION ACT)

Parentally placed private school students refers to students with disabilities who are placed in a private school by their parents when a free appropriate public education (FAPE) is not at issue.

3.	Did the public school district where your school is located contact you regarding benefits and services for students with disabilities for the 2004-05 school year?
	(Circle one)
	YES1
	NO2
4.	During the 2004-05 school year, how many students did you refer to the public school districts for special education services? (Be sure to include referrals made to school districts that are outside of the one in which you are located.)
5.	Do you know how many students in your school were identified <i>by a <u>public</u></i> <u>school district</u> as children with disabilities?
	(Circle one)
	YES1
	NO2

6. Did your school assist the public school district in which your school is located by providing information about children suspected of having disabilities in any of the following ways?

	Circle one	on each line
a. Provided mailing list of all parents	YES	NO
b. Provided district contact information for parents of students with suspected disabilities	YES	NO
c. Organized parent information session	YES	NO
d. Referred parents and/or students to the district's IDEA representative	YES	NO
e. The district did not ask us to assist with child find activities	YES	NO
f. Other. Please specify.	YES	NO

7.	Has the district provided you with information about how to make a referral
	for children with suspected disabilities?
	(Circle one)

	(Circie ori	ᅜ
YES	1	
NO	2	

Did the public school district in which your school is located consult with

8.

8a. If YES, with whom?		Circle one	e on each line
a. Private school organization (e.g. diocesan office)	YES	NO	Don't Know
b. Private school administrators	YES	NO	Don't Know
c. Private school parents	YES	NO	Don't Know
d. Other. Please specify:	YES	NO	Don't Know

QUESTION 9.

	(Circ	le one o	n each l	ine)
8b. If YES, please indicate the extent to which district consultations about IDEA were useful for the topics listed in the table below. Please use a scale from 1 (Not Useful) to 4 (Very Useful).	Not	Use	ful	Very
The identification of eligible students through the child find process	1	2	3	4
b. Informing private school representatives about the child find process	1	2	3	4
c. How the share of federal IDEA funds available for services for private school students was calculated	1	2	3	4
d. How the consultation process between the district and private school participants will operate throughout the school year	1	2	3	4
e. Types of special education and related services and alternative service delivery mechanisms	1	2	3	4
f. How to distribute funds if insufficient to serve all children	1	2	3	4
g. How and when decisions on the delivery of special education services are provided will be made	1	2	3	4
h. Location of services	1	2	3	4
How the LEA will explain the reasons for not providing services when in disagreement with private school officials	1	2	3	4

8c. If YES, were you asked to provide a	written affirmation documenting
participation?	(Circle one
YES	
NO	2

9. Did any of your students receive the following services from a public school district under IDEA in the 2004–05 school year? (Be sure to include students who are receiving services from school districts outside the one in which you are located.)

	NO Service	IF "YES," select or of services as		
Special education instructional services	NO	YES, Direct Services	YES, Consultative	
b. Equipment	NO	YE	S	
c. Assistive technology	NO	YE	S	
d. Related services, including				
audiology services	NO	YES, Direct Services	YES, Consultative	
counseling, including rehabilitation counseling	NO	YES, Direct Services	YES, Consultative	
medical services	NO	YES, Direct Services	YES, Consultative	
occupational therapy	NO	YES, Direct YES, Services Consultativ		
orientation and mobility services	NO	YES, Direct Services	YES, Consultative	
physical therapy	NO	YES, Direct Services	YES, Consultative	
recreation, including therapeutic recreation	NO	YES, Direct Services	YES, Consultative	
school nurse services	NO	YES, Direct Services	YES, Consultative	
social work services	NO	YES, Direct Services	YES, Consultative	
speech-language	NO	YES, Direct Services	YES, Consultative	
transportation	NO	YE	S	
e. Other. Please specify.	NO	YES, Direct Services	YES, Consultative	

10. Where are IDEA services provided for the children attending your school?

	Circle one on each line		
a. At your private school	YES	NO	
b. At a public school or district site	YES	NO	
c. Other. Please specify:	YES	NO	

IF YOUR SCHOOL DID NOT PARTICIPATE IN ANY FEDERAL EDUCATION PROGRAMS UNDER NO CHILD LEFT BEHIND (NCLB), PLEASE NOW SKIP TO QUESTION 21.

PART 3. NO CHILD LEFT BEHIND (NCLB)

11. For school year 2004–05, please indicate, by program, how many private school students and teachers/personnel participated or received services, checking N/A if your school did not participate. Please also check the services provided to your school's students or teachers/personnel under each program.

		Numbers Participating			Services Received					
	N/A	Students	Teachers/ Personnel	Parents	None	Professional Development	Parental Involvement	Instructional Services to Students	Equipment / Materials	Other
a. Title I (A) Improving Basic Programs Operated by LEAs ²⁵										
b. Title I (B, Sub 1) Reading First										
c. Title I (B, Sub 3) Even Start Family Literacy										
d. Title I (C) Migrant Education										
e. Title II (A) Teacher & Principal Training and Recruiting										
f. Title II (B) Math/Science Partnerships										
g. Title II (D) Enhancing Educ through Tech										
h. Title III (A) Language Instruction for LEP Students										
i. Title IV (A) Safe and Drug-Free Schools/ Communities										
j. Title IV (B) 21st- Century CLC										
k. Title V (A) Innovative Programs										

²⁵An LEA is a Local Educational Agency (e.g., local public school district)

PART 4. Title I (A)

12. In school year 2004–05, did your school provide school district or intermediate district administrators with the number of students from low-income families enrolled in your school living in a participating Title I (A) attendance area?

VEC	(Circle	one)	
NO		2	
12a. IF YES, what assistance was offered?	Circle one	on each line	1
a. We provided names and addresses of students.	YES	NO	
b. We provided family income information.	YES	NO	
c. We surveyed our school's parents	YES	NO	

YES

YES

NO

NO

13. In 2004–05, did any students at your school *receive* Title I (A) services?

d. We provided tuition scholarship information.

e. Other. Please specify.

(Circle one)	
YES 1	If YES, how many?
NO2	

13a. IF NO, why not?	Circle one	on each line
a. No students resided in a participating public school Title I (A) attendance area.	YES	NO
b. No students residing in a Title I (A) attendance area generated funds.	YES	NO
c. No students residing in a Title I (A) attendance area were educationally needy.	YES	NO
d. My school chose not to participate.	YES	NO
e. Parents preferred that their children not participate.	YES	NO
f. Other. Please specify.	YES	NO

14. Do you know the total amount of Title I (A) funds allocated for services for students at your school in 2004–05?

	(Circle one)	
YES	1 — If YES, how much?	
NO	2	

15. Which of the following parental involvement and professional development activities did your district provide for parents and teachers of students receiving Title I (A) services at your school in 2004_05?

	Circle	one on e	each line	
Parental Involvement Activities				
a. Parent Newsletter	YES	NO	Don't Know	
b. Parent-teacher conferences	YES	NO	Don't Know	
c. Parent meetings	YES	NO	Don't Know	
c. Classes or workshops for parents	YES	NO	Don't Know	
e. Take-home books and materials	YES	NO	Don't Know	
f. Summer activity kits	YES	NO	Don't Know	
g. None.	YES	NO	Don't Know	
h. Other. Please specify.	YES	NO	Don't Know	
Professional Development Activitie	s			
i. Professional development on-site of private school for private school teachers	YES	NO	Don't Know	
j. Professional development at public school site	YES	NO	Don't Know	
k. Professional development through a third-party provider	YES	NO	Don't Know	
I. Payment for graduate courses	YES	NO	Don't Know	
m. Payment for workshops and conferences	YES	NO	Don't Know	
n. Other. Please specify:	YES	NO	Don't Know	

PART 5. CONSULTATIONS WITH SCHOOL DISTRICT OFFICIALS

	to participate in federal education programs under		(Circle one
	'ESIO		
17.	Did consultation about private school participatio occur with the district?	n in NCLB p	rograms
	- YES		(Circle one
	NO		2
•	17a. If YES, with whom?	Circle one	on each line
	a. Administrators at the diocesan or association level	YES	NO
	b. Administrators at the school-level	YES	NO
	c. Other. Please specify:	YES	NO
	17b. If NO, why not?	Circle one	on each line
	a. We chose not to participate	YES	NO
	b. Association or diocesan level administrators made decision not to participate	YES	NO
	c. School district did not contact us	YES	NO
	d. Other. Please specify:	YES	NO

18. Did the school district or intermediate district consult in a meaningful and timely fashion with private school officials regarding participation in Title I (A)? (Circle one) Circle one on each line 18a. IF YES, with whom? a. Private school organization (e.g. diocesan office) YES NO b. Private school administrators YES NO 18b. IF YES, on which topics? Circle one on each line a. Number of private school students who generate YES NO funds for Title I (A) services YES b. Administrative costs NO c. Per-pupil allocation YES NO d. Determination to "pool" resources YES NO e. Determination of which eligible students will receive services (including criteria for determining NO YES eligibility) f. Assessment of student learning needs YES NO g. Assignment of staff who will provide services to YES NO private-school students YES h. Type of services to be provided NO i. Location of services YES NO j. Challenging student performance standards YES NO k. Assessment methods of students' progress in

meeting challenging performance standards

I. Professional development of private school

m. Activities for private school parents of Title I (A)

teachers of Title I (A) participants

participants

YES

YES

YES

NO

NO

NO

19. Did the district consult in a *meaningful and timely fashion* with private school officials regarding participation in any <u>other NCLB programs</u>?

	No or		Yes, on the following topics					
	N/A	Needs of students	Teacher Prof Develop ment Needs	Amt of Funding Available	Types of Services	Service Provider	Assessment of Services	Service Location
a. Title I (B, Sub 1) Reading First								
b. Title I (B, Sub 3) Even Start Family Literacy								
c. Title I (C) Migrant Education								
d. Title II (A) Teacher & Principal Training and Recruiting								
e. Title II (B) Math/Science Partnerships								
f. Title II (D) Enhancing Educ through Tech								
g. Title III (A) Language Instruction for LEP Students								
h. Title IV (A) Safe and Drug-Free Schools/ Communities								
i. Title IV (B) 21st- Century CLC								
j. Title V (A) Innovative Programs								

20.	In working with your public school district in the 2004-05 school year, to what
	extent did the following barriers impact timely and meaningful consultation?

		(Circle one	e on each line)	
	Not A Barrier	Minor Barrier	Somewhat A Barrier	Major Barrier
a. Limited understanding of or experience by the district with equitable participation requirements of NCLB				
b. Limited communication from the public school district				
c. Lack of timely and meaningful consultation with the district				
d. Absence of district procedures and policies to facilitate consultation				
e. Other. Please specify.				

PART 6. BACKGROUND INFORMATION

21. Which best describes your school's orientation or affiliation?

		Circle one on each line	
a.	Catholic (including Parochial or Inter-parochial, Diocesan, or Private)	YES	NO
b.	Other religious	YES	NO
C.	Non-sectarian	YES	NO

22. Which best describes your position(s)?

		Circle one on each line	
a.	Principal/administrator in a private school	YES	NO
b.	Administrator/staff in private school organization (e.g. system level or diocesan office)	YES	NO
C.	Other staff in a private school	YES	NO
d.	Other. Please specify.	YES	NO

23.	What is your school enrollment?	
stu	udents	

24. How would you best describe the grade level of your school?

	Circle one on each line		
a. Elementary	YES	NO	
b. Middle School	YES	NO	
c. High School	YES	NO	
d. Other. Please specify.	YES	NO	

25. Have you received help from any of the following sources in working with the district in implementing federal education programs for your students and teachers?

	Circle one on each lir	
a. Technical assistance from the state	YES	NO
b. District-wide private school working group	YES	NO
c. Technical assistance from U.S. Department of Education	YES	NO
d. U.S. Department of Education publications	YES	NO
e. U. S. Department of Education sponsored workshops and conferences on federal education programs	YES	NO
f. U.S. Department of Education Web site.	YES	NO
g. Other. Please specify.	YES	NO

THANK YOU FOR ASSISTING US WITH THIS IMPORTANT SURVEY. YOUR TIME AND EFFORT ARE GREATLY APPRECIATED.

Please return completed survey to:

Ary Amerikaner Education Policy Center The Urban Institute 2100 M Street, NW Washington, DC 20037

STUDY OF PRIVATE SCHOOL STUDENT PARTICIPATION IN FEDERAL EDUCATION PROGRAMS

U.S. DEPARTMENT OF EDUCATION POLICY AND PROGRAM STUDIES SERVICE

THE URBAN INSTITUTE WASHINGTON, DC

Survey of District Administrators

To complete this survey online go to:

www.privateschsurvey.districts.urban.org

Username: «Username» Password: «Password»

Responses to this data collection will be used only for statistical purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district or individual. We will not provide information that identifies you or your district to anyone outside the study team, except as required by law.

We recommend you briefly reviewing the entire survey before trying to complete it. You may need to collaborate with individuals with specific information about federal programs, including IDEA, to obtain all of the information necessary to complete the questionnaire.

Please return your completed guestionnaire to:

Ary Amerikaner Education Policy Center The Urban Institute 2100 M Street, NW Washington, DC 20037

If you have questions, please contact Ary Amerikaner at **PrivateSCHSurvey@ui.urban.org** or 1-866-859-0635.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB number. The valid OMB control number of this information collection is 1875-0236. The time required to complete this information collection is estimated to average 30 minutes per survey, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimates(s) or suggestion for improving this form, please write to: U.S. Department of Education, Washington, 20202-4651. If you have comments or concerns regarding the status of your individual submission of this form, write directly to: Policy and Program Studies Service, Office of Planning, Evaluation and Policy Development, US Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202.

O.M.B. NO. 1875-0236 Approval Expires 08/31/2008

PART 1. PRIVATE SCHOOLS AND PRIVATE SCHOOL STUDENTS COUNTS²⁶

1.	How many non-profit, K-12 private <u>schools</u> , including religious schools, are located within your district boundary? private schools
2.	How many of those private schools, including religious schools, participated in any federal education programs under No Child Left Behind-NCLB in school year 2004–05?
	private schools
2	How many private schools had students with disabilities receiving benefits
J.	How many private schools had students with disabilities receiving benefits from the Individuals with Disabilities Education Act (IDEA) in school year 2004–

²⁶ Questions asked in this survey regarding private school students should not include home schooled students.

PART 2. IDEA (INDIVIDUALS WITH DISABILITIES EDUCATION ACT)

Parentally placed private school students refers to students with disabilities who are placed in a private school by their parents when a free appropriate public education (FAPE) is not at issue.

4. Please indicate which of these <u>child find procedures</u> your district uses to identify *parentally placed* private school students with disabilities.

	Circle one on each lin	
Mass mailing to all households in public school attendance area	YES	NO
b. Radio or TV public service announcements	YES	NO
c. Information on school district website	YES	NO
d. Distribution of informational brochures	YES	NO
e. Presentation at private schools	YES	NO
f. Outreach at community events	YES	NO
g. Outreach to private schools	YES	NO
h. Other. Please specify.	YES	NO

5. Who evaluates *parentally placed* private school students in your district to determine eligibility for services under IDEA?

	Circle one on each line	
a. Public school staff	YES	NO
b. Contracted third-party	YES	NO
c. Other. Please specify.	YES	NO

ACCORD NO	Circle one YES YES	
a. Private school organization (e.g. diocesan office)b. Private school administrators	YES YES	
b. Private school administrators	YES	NO
c. Private school parents	\/E0	NO
	YES	NO
6b. IF YES, on which topics?a. The identification of eligible students through the	Circle one YES	on each line
child find process	YES	NO
 Informing private school representatives about the child find process 	YES	NO
c. How the share of federal IDEA funds available for services for private school students was calculated	YES	NO
d. How the consultation process between the district and private school participants will operate throughout the school year	YES	NO
e. Types of special education and related services and alternative service delivery mechanisms	YES	NO
f. How to distribute funds if insufficient to serve all children	YES	NO
g. How and when decisions on the delivery of special education services provided will be made	YES	NO
h. Location of services	YES	NO

6c.	If YES, did you obtain a written affirmation?	(Circle one
	YES	1
	NO	2

7. Did your district provide services to parentally placed private-school students with disabilities during school year 2004–05? (Circle one)

~YES	1
NO	.2
NOT APPLICABLE (No parentally placed private school students	
in my district were eligible)	,3
,	ļ
	•

7a. IF YES, which services?	NO	IF "YES," select one or both	
	Service	types of services as appropriate	
a. Special education instructional	NO	YES, Direct	YES,
services	NO	Services	Consultative
b. Equipment	NO	YES	
c. Assistive technology	NO	YES	
d. Related services, including			
audiology services	NO	YES, Direct	YES,
		Services	Consultative
counseling, including	NO	YES, Direct	YES,
rehabilitation counseling	NO	Services	Consultative
medical services	NO	YES, Direct	YES,
	NO	Services	Consultative
occupational therapy	NO	YES, Direct	YES,
	NO	Services	Consultative
orientation and mobility	NO	YES, Direct	YES,
services	NO	Services	Consultative
physical therapy	NO	YES, Direct	YES,
1,7	NO	Services	Consultative
recreation, including	NO	YES, Direct	YES,
therapeutic recreation	NO	Services	Consultative
school nurse services	NO	YES, Direct	YES,
	NO	Services	Consultative
social work services	NO	YES, Direct	YES,
	NO	Services	Consultative
speech-language	NO	YES, Direct	YES,
		Services	Consultative
transportation	NO	YES	
e. Other. Please specify.	NO	YES, Direct	YES,
	NO	Services	Consultative

7b. IF NO, why not?	Circle one on each line	
a. Lack of transportation	YES	NO
b. Funds were inadequate	YES	NO
c. Parents declined services	YES	NO
d. Other. Please specify.	YES	NO
PLEASE NOW SKIP TO QUESTION 10.		

8.	Where are the IDEA services provided for parentally placed students with
	disabilities?

	Circle one on each line	
a. On-site at private schools	YES	NO
b. At a public school or district site	YES	NO
c. Other. Please specify:	YES	NO

9.	Did ALL e	ligible private	school stud	ents with o	disabilities	receive	services
	under IDEA?	(Circle one)					

YES	 	1
NO	 	2

9a. IF NO, why not?	Circle one	on each line
a. Parents declined services	YES	NO
b. IDEA funds were inadequate to serve all children identified in the child find process	YES	NO
c. Other. Please specify.	YES	NO

10. In *addition* to federal IDEA funds, what state and local funds, if any, are used to provide services to parentally placed private school students with disabilities in your district in SY 2004–05?

\$ in local funds	Check here ☐ if you do not know
\$ in state funds	Check here \square if you do not know

PART 3. FEDERAL PROGRAMS UNDER NCLB/ SERVICES TO PRIVATE SCHOOL STUDENTS AND TEACHERS

11. For school year 2004–05, please indicate, by NCLB program, the total allocation that your district received and the amount allocated for services for private school participants. (If you do not receive funds for a particular Title write '0' under Total District Allocation. If you do not know allocations, write DK under Total District Allocation.) Please also check the types of services provided to private school participants, marking "None" if no services were provided to private school participants.

		Funds	Services Provided					
	Total District Allocation (2004-05)	Allocated for Services for Private School Participants (2004-05)		Professional Development		Instructional Services to Students	Equipment /Materials	Other
a. Title I (A) Improving Basic Programs Operated by LEAs ²⁷	\$	\$						
b. Title I (B, Sub 1) Reading First	\$	\$						
c. Title I (B, Sub 3) Even Start Family Literacy	\$	\$						
d. Title I (C) Migrant Education	\$	\$						
e. Title II (A) Teacher & Principal Training and Recruiting		\$						
f. Title II (B) Math/Science		\$						
g. Title II (D) Enhancing Educ through Tech	\$	\$						
h. Title III (A) Language Instruction for LEP Students	\$	\$						
i. Title IV (A) Safe and Drug-Free Schools/ Communities	\$	₩						
j. Title IV (B) 21st-	\$	\$						
k. Title V (A) Innovative Programs		\$						

²⁷ An LEA is Local Educational Agency (e.g., local public school district)

12. For school year 2004–05, please indicate the total number of private school students, teachers, and parents where appropriate who received services by program, marking "0" if no services were provided to the private school participants. If your district received no funding or you do not know, please check the appropriate box to the right.

	Number of Private School Participants		District Received	Don't	
	Students	Teachers	Parents	No Funding	Know
a. Title I (A) Improving Basic Programs Operated by LEAs					
b. Title I (B, Sub 1) Reading First					
c. Title I (B, Sub 3) Even Start Family Literacy					
d. Title I (C) Migrant Education					
e. Title II (A) Teacher & Principal Training and Recruiting					
f. Title II (B) Math/Science Partnerships					
g. Title II (D) Enhancing Educ through Tech					
h. Title III (A) Language Instruction for LEP Students					
i. Title IV (A) Safe and Drug-Free Schools/ Communities					
j. Title IV (B) 21st- Century CLC					
k. Title V (A) Innovative Programs					

PART 4. TITLE I (A)

IF YOUR <u>DISTRICT</u> RECEIVED NO TITLE I (A) FUNDS, PLEASE SKIP TO QUESTION 19.

13. In planning for the 2004–05 school year, what <u>method</u> did your district use to determine the number of private school children from <u>low-income families</u>?

	•	Circle one	on each line
a.	We used the same poverty data to identify and count low-income students in both public and private schools	YES	NO
b.	We extrapolated from a representative survey sample to determine the number of low-income children who attend private schools	YES	NO
C.	We correlated data from two different data sources to determine the number of low-income children who attend private schools	YES	NO
d.	We use proportionality: applying the low-income percentage of each participating public school attendance area to the number of private school children who reside in that school attendance area.	YES	NO
e.	Other. Please specify:	YES	NO

14. In school year 2004–05, did any private school participants (students, teachers, or parents) in your district receive Title I (A) services?

(Circle one)

YES	. 1
NO	2

14a. If NO, why not?	Circle one	on each line
a. My district did not receive Title I (A) funds	YES	NO
 b. No private school students residing in my district generated funds 	YES	NO
c. No private school children residing in my district were failing or at risk of failing to meet educational standards	YES	NO
d. Private school officials in my district did not respond to a request for information to identify students needing services	YES	NO
e. Private school officials in my district declined the offer of Title I services.	YES	NO
f. Other. Please specify.	YES	NO

PLEASE NOW SKIP TO QUESTION 19.

14b. If YES, these funds were	Circle one	on each line
a. Distributed on a school-by-school basis based on the number of students generating funds.	YES	NO
b. Pooled. Funds were combined and services provided to students most at risk.	YES	NO
c. Other. Please specify.	YES	NO

15. Where and how do private school students receive Title I (A) services?

	Circle one	on each line
a. At private school with a district teacher	YES	NO
b. At private school with a third-party provider	YES	NO
c. At private school in a computer-assisted lab	YES	NO
d. At private school in a mobile van unit	YES	NO
e. At public school with a district teacher	YES	NO
f. Other. Please specify.	YES	NO

16.	Do private school students participate in Title I (A) services or activities
	during non-school hours (i.e. summer programs or before and after-school
	programs)? (Circle one)

YES	1
 NO	2

16a. If NO, why not?	Circle one	on each line
a. Extended time services are offered but private school students do not participate	YES	NO
b. Extended time services are not offered to private school students	YES	NO
c. Extended time services are not offered to public or private school students	YES	NO

17. Please identify <u>parental involvement activities</u> for parents of private school Title I (A) participants.

	Circle one	on each line
a. Parent newsletter	YES	NO
b. Parent meetings	YES	NO
c. Parenting classes and workshops	YES	NO
d. Parent-teacher conferences	YES	NO
e. Take home materials and books	YES	NO
f. Summer activity kits	YES	NO
g. Other. Please specify.	YES	NO

18. Please identify <u>professional development activities</u> for private school teachers who have Title I (A) participants in their classes.

	Circle one	on each line
a. Provide professional development on-site of private school for private school teachers	YES	NO
b. Provide professional development at public school site	YES	NO
c. Provide professional development through a third-party provider	YES	NO
d. Provide payment for graduate courses	YES	NO
e. Provide payment for workshops and conferences	YES	NO
f. Other. Please specify.	YES	NO

PART 5. CONSULTATION WITH PRIVATE SCHOOL OFFICIALS

19. Did your district consult in a *meaningful and timely fashion* with private school officials regarding participation in <u>Title I (A)</u>? (Circle one)

YESNO		1 ———— 2	
19a. IF YES, with whom?	Circle one	on each line	•
a. Private school organization (e.g. diocesan office)	YES	NO	
b. Private school administrators	YES	NO	
19b. IF YES, on which topics?	Circle one	on each line	←

19b. IF YES, on which topics?	Circle one	on each line
a. Number of private school students who generate funds for Title I (A) services	YES	NO
b. Administrative costs	YES	NO
c. Per-pupil allocation	YES	NO
d. Determination to "pool" resources	YES	NO
e. Determination of which eligible students will receive services (including criteria for determining eligibility)	YES	NO
f. Assessment of student learning needs	YES	NO
g. Assignment of staff who will provide services to private-school students	YES	NO
h. Type of services to be provided	YES	NO
i. Location of services	YES	NO
j. Challenging student performance standards	YES	NO
k. Assessment methods of students' progress in meeting challenging performance standards	YES	NO
Professional development of private school teachers of Title I (A) participants	YES	NO
m. Activities for private school parents of Title I (A) participants	YES	NO

20. Did your district consult in a *meaningful and timely fashion* with private school officials regarding participation in any of the following NCLB programs?

	No or	Yes, on the following topicsCheck all that apply.						
	<u>N/A</u>	Needs of students	Teacher Prof Devpmnt Needs	Amt of Funding Available	Types of Services	Service Provider	Assessment of Services	Service Location
a. Title I (B, Sub 1) Reading First								
b. Title I (B, Sub 3) Even Start Family Literacy								
c. Title I (C) Migrant Education								
d. Title II (A) Teacher & Principal Training and Recruiting								
e. Title II (B) Math/Science Partnerships								
f. Title II (D) Enhancing Educ through Tech								
g. Title III (A) Language Instruction for LEP Students								
h. Title IV (A) Safe and Drug-Free Schools/ Communities								
i. Title IV (B) 21st- Century CLC								
j. Title V (A) Innovative Programs								

(Mark one on each line)					
	Not A Barrier	Minor Barrier	Somewhat A Barrier	Major Barrie	
a. Limited understanding of or experience with the equitable participation requirements of NCLB					
b. Difficulty coordinating internally in the district					
c. Inadequate information about with whom to consult in private schools					
d. Lack of assistance from private schools in identifying needs of their students and teachers					
e. Absence of district procedures and policies relating to the equitable participation requirement					
f. Other. Please specify.					

e. Absence of district procedures and policies relating to the equitable participation requirement				
f. Other. Please specify.				
22. Does your district maintain writte school officials?	en records	of consult	ations with p	rivate
			Circle one o	n each line
a. For Title I (A)			YES	NO
b. For other NCLB programs			YES	NO
23. Does your district have a sign-of private school officials have occu				ate topics?
			s <u>all appropri</u>	ate topics?
private school officials have occu			S all appropri Circle one o	ate topics? n each line

25. Have you received help from any of the following sources in implementing federal education programs for your students and teachers?

	Circle one	on each line
a. Technical assistance from the state	YES	NO
b. District-wide private school working group	YES	NO
c. Technical assistance from U.S. Department of Education	YES	NO
d. U.S. Department of Education publications	YES	NO
e. U. S. Department of Education sponsored workshops and conferences on federal education programs	YES	NO
f. U.S. Department of Education Web site	YES	NO
g. Other. Please specify.	YES	NO

Please return completed survey to:

Ary Amerikaner Education Policy Center The Urban Institute 2100 M Street, NW Washington, DC 20037



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