Nonregulatory Guidance

TARGETED ASSISTANCE SCHOOLS

Editor's Note:

This guidance was issued under the Improving America's School Act of 1996. It is the only guidance currently available regarding targeted assistance programs, and most of it is still applicable under the No Child Left Behind Act of 2001. In the few cases where the guidance is not consistent with No Child Left Behind, the editors have annotated it accordingly.

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FINAL GUIDANCE

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TARGETED ASSISTANCE PROGRAMS

A. What is a Targeted Assistance School?

A targeted assistance school, primarily addressed in section 1115 of Title I, Part A, is one that receives Part A funds yet is ineligible or has chosen not to operate a Title I schoolwide program. The term "targeted assistance" signifies that the services are provided to a select group of children--those identified as failing, or most at risk of failing, to meet the State's challenging content and student performance standards--rather than for overall school improvement, as in schoolwide programs.

Like schoolwide program schools, the goal of a targeted assistance school is to improve teaching and learning to enable Part A participants to meet the challenging State performance standards that all children are expected to master. To accomplish this goal, a targeted assistance program must be based on effective means for improving achievement of participating children; use effective instructional strategies that give primary consideration to extended-time strategies, provide accelerated, high-quality curricula, and minimize removing children from the regular classroom during regular school hours; coordinate with and support the regular education program; provide instruction by highly-qualified and trained professional staff; and implement strategies to increase parental involvement.

A targeted assistance school differs from a schoolwide program school in several significant respects:

- Part A funds may be used in targeted assistance schools only for programs that provide services to eligible children identified as having the greatest need for special assistance.
- Part A funds must be used for services that supplement, and do not supplant, the services that would be provided, in the absence of the Part A funds, from non-Federal sources.
- Records must be maintained that document that Part A funds are spent on activities and services for only Part A participating students.

B. Understanding Targeted Assistance Programs

➤ *Who is Eligible for Part A Services?*

One of the primary differences between schoolwide program schools and targeted assistance schools is the requirement that the latter may use Title I, Part A funds only for programs that provide services to eligible children identified as having the greatest need for special assistance. Targeted assistance schools, therefore, may not provide services to all children in the school or in particular grades.

In the new Title I, schools play the key role in selecting children to participate in Part A programs. No longer is there a requirement for a districtwide needs assessment in which children are selected on the basis of uniform criteria across the LEA as a whole. Rather, as described below, an LEA establishes multiple, educationally related, objective criteria to determine which children are eligible to participate in Part A. Each targeted assistance school may supplement these criteria and selects, from among its eligible children, those who are in greatest need for Part A assistance.

- *Children eligible for Part A services must be from the following populations:*
  - o Children not older than age 21 who are entitled to a free public education through grade 12.
  - o Children who are not yet at a grade level where the LEA provides free public education, yet are of an age at which they can benefit from an organized instructional program provided in a school or other educational setting.[1]
- *Eligible children are children who are failing, or most at risk of failing, to meet the State's challenging student performance standards.*
  - o A targeted assistance school generally identifies eligible children within the school on the basis of multiple, educationally related, objective criteria established by the LEA and supplemented by the school.
  - o Children who are economically disadvantaged, children with disabilities, migrant children, and limited English proficient (LEP) children are eligible for Part A services on the same basis as other children that are selected for services. Thus, schools are no longer required to demonstrate that the needs of LEP students stem from educational deprivation and not solely from their limited English proficiency. Similarly, schools are no longer required to demonstrate that the needs of children with disabilities stem from educational deprivation and not solely from their disabilities.
  - o Children from preschool through grade two must be selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate mea-

[1]No Child Left Behind deleted the text in this bullet beginning with "yet are of an age..." and ending with "...educational setting."

sures that determine which children are failing, or most at risk of failing, to meet the State's challenging content and student performance standards.

- *Certain children are considered at risk of failing to meet the State's student performance standards and are thus eligible for Part A services by virtue of their status:*
  - Children who participated in a Head Start or Even Start program at any time in the two preceding years.
  - Children who received services under a program for youth who are neglected, delinquent, or at risk of dropping out under Part D of Title I (or its predecessor authority) at any time in the two preceding years.
  - Children in a local institution for neglected or delinquent children or attending a community day program.
  - Homeless children attending any school in the LEA.
- *From the universe of eligible children in a targeted assistance school, the school selects those children who have the greatest need for special assistance to receive Part A services.* Because it is likely that a school will not have sufficient Part A resources to provide services to all eligible children, the school must obviously make some informed choices concerning which children to serve. These choices are difficult because they inevitably result in some children being selected before other children who may also have significant needs. School staff, in consultation with the LEA and based on a review of all the information available about the performance of eligible children, must use their best professional judgment in making these choices.

It is not so simple as merely selecting a cut-off score on an assessment measure. School staff will necessarily need to balance the needs of different populations. For example, most schools will likely need to concentrate Part A resources in certain grades or in certain subjects to the exclusion of children in the grades or subjects not being served. Similarly, a school may decide that some children who are homeless have greater needs because, for instance, homeless children may likely face problems of attendance and homework completion due to recurrent moves and, therefore, may be at greater risk of failure than some other children who are not faced with the disruption associated with homelessness.

Furthermore, schools and LEAs that focus strongly on family literacy, for example, may add the additional educationally-related criterion of the educational level of parents when selecting those children who are most in need of Part A assistance from the eligible pool of students to be served.

Other target populations, such as children with disabilities and LEP children, present similar choices. Those children are now eligible for Part A services on the same basis as other eligible children. However, they are also entitled to non-Part A services required by law because of their disability or their limited proficiency in English. A school may decide that the non-Part A services those children are receiving are sufficient to enable them to meet the State's challenging standards. However, children with disabilities or limited-English proficiency who are performing more poorly than other Title I-eligible children, even with the benefit of the non-Title I services they receive, may still be among those in greatest need and thus should receive Part A services also.

Q1. May an LEA and school use Part A funds to identify at-risk students?

A. No. It is the responsibility of the LEA and school to identify at-risk students from State or local sources. Once eligible children are identified, Part A funds may be used to identify those most in need or to identify their specific educational needs.

Q2. May a school provide services to particular children for less than a full school year?

A. A school may serve students who are in greatest need of assistance for only a particular skill for the period of time it takes the student to master the skill. In other words, if not necessary, a student need not be a participant for an entire school year.

C. Ensuring High-Quality Targeted Assistance Programs

Part A emphasizes the roles of the school, LEA, and SEA to create an environment of improved teaching and learning for all children, particularly those who are furthest from meeting the State's challenging content and performance standards. The key components contained in the Targeted Assistance Schools section of Title I, Part A reflect the focus of teaching and learning--coordinating students' educational programs and employing effective strategies for improving student achievement.

➤ *School-Level Decision-Making*

One of Title I's most significant changes brings Part A program decisions to the school level. *Schools, in consultation with their districts, determine the uses of funds that best meet the needs of their students.* The new Title I, Part A distributes funds to schools based on the number of children from low-income families in the school or school attendance area. The school then selects the children to serve, based on those who are most in need of service *in the school* and on the amount of funds available.

Each Title I targeted assistance school must work with its district to determine how to use its Part A funds in ways that make the most sense for its students. Bringing these decisions to the school level will transform Part A from a district-directed "one-size-fits-all" program to a significant resource for schools to use to meet the needs of their most at-risk students. For example, a school can take into consideration times that students participate in other activities and design a Part A program that optimally allows the students to participate in the regular program of instruction.

Although LEAs establish general student eligibility criteria, the fact that schools may add school-level criteria and select those children in greatest need will ultimately result in varied Part A services from school to school. However, each of an LEA's twenty schools might add a set of supplemental, multiple, educationally-related objective criteria to select students in the school.

Given that each of these schools could have different selection criteria, it is likely that many Title I schools in the LEA will offer different Part A services. For example, one school might offer reading services to the primary grades, another might offer reading to all grades and math in grades 4 through 6, while another might focus on reading along with an intensive professional development component.

➤ *Essential Components of Targeted Assistance Programs*

Title I has a clear goal — enabling participating children to achieve to challenging State content and performance standards. To meet this goal, section 1115(c) requires that each targeted assistance program include certain components that research suggests are essential to any high-functioning program (see box, next page).

Each targeted assistance school must assist Part A participants in meeting the State's proficient and advanced levels of performance by —

- Coordinating Part A resources with other resources; and
- Reviewing, on an ongoing basis, the progress of participants and revising the targeted assistance program, if necessary, to provide additional assistance to enable them to meet the State's challenging student performance standards.[2]

D. Serving Limited English Proficient Students and Students with Disabilities

Children with disabilities and LEP children are eligible for Part A services on the same basis as other children who are selected for services. However, they are also entitled to services required by law because of their disability or their limited proficiency in English. To avoid supplanting, a targeted assistance school may not use Part A funds to provide the level of services necessary to meet Federal, State, or local law requirements for limited-English-proficient children or children with disabilities.

Part A funds may be used, however, to coordinate and supplement these services as well as to provide additional direct services to these children. In particular, there is no prohibition from providing Title I services in the same subject area in which a child is receiving special education services or services to address limited-English proficiency. For example, a special education student being provided with special education services in reading that are sufficient to meet the requirements of Part B of the Individuals with Disabilities Education Act (IDEA) may also be provided Part A services in reading if the school identifies the student as being in greatest need of assistance for meeting the State's challenging content and student performance standards. The non-Part A services alone, however, must be sufficient to meet the requirements of Part B of IDEA.

Examples of Title I-Funded Services for LEP Students:

- Title I funds are used to pay the salaries of instructional staff who work with those students having academic difficulties, including LEP students, as well as for native language instructional materials where the district's selected alternative language program only requires use of the English language as a means of instruction. Such staff includes additional ESL/bilingual teachers above and beyond what is paid for with Title VII funds and funds from comparable state programs, as well as other staff who work closely with the ESL bilingual teachers and regular classroom teachers.
- An LEA has a Title I-funded accelerated before- and after-school program for LEP students. One part of the program pairs high school and elemen-

[2]At this point in the original text, there was a Q&A (Q3) regarding highly qualified teachers. This Q&A was completely superseded by NCLB, so it has been deleted from this text to avoid confusion.

Components of a Target Assistance Program

(*Editor's note:* The following table lists the components as amended under No Child Left Behind.)

Under Section 1115(c), a targeted assistance program includes the following 8 components. It must—

1. Use the *program's resources* under this part to help participating children meet the state's challenging student academic achievement standards expected for all children;

2. Ensure that *planning* for students served under Part A is incorporated into existing school planning;

3. *Use effective methods and instructional strategies* that are based on scientifically based research that strengthens the core academic program of the school and that —

   (a) give primary consideration to providing extended learning time, such as an extended school year, before- and after-school, and summer programs and opportunities;

   (b) help provide an accelerated, high-quality curriculum, including applied learning; and

   (c) minimize removing children from the regular classroom during regular school hours for Part A instruction;

4. *Coordinate with and support the regular education program*, which may include services to assist preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First or state-run preschool programs to elementary school programs;

5. Provide instruction by *highly qualified teachers*;

6. Provide opportunities for *professional development* with resources provided under Part A, and, to the extent practicable, from other sources, for teachers, principals, and paraprofessionals, including, if appropriate, pupil services personnel, parents, and other staff, who work with participating children in programs under this section or in the regular education program;

7. Provide strategies to increase *parental involvement*, such as family literacy services; and

8. *Coordinate and integrate Federal, State, and local services and programs*, including programs supported under NCLB, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

tary school students for activities such as shared reading and writing time. Guided reading, math, and science activities and reinforcement of content concepts studied during the day are also an integral part of these sessions.

- An LEA uses Title I funds for an accelerated summer academic program for LEP students to build upon the skills that are developed during the school year in literacy and content mastery. One part of the program groups Title I-eligible LEP students by grade level and teams them with English-proficient Title I students. This gives the LEP students greater opportunity for English language usage. The content-based language instruction program is taught by a team of teachers--pairing a bilingual and non-bilingual staff member in each class. A variety of activities, such as field trips, are an integral part of the instructional program and provide opportunities to enrich language experiences.

Examples of Title I-Funded Services for Disabled Students:

- A teacher provides supplemental instructional assistance to disabled Title I students during their mainstreamed instructional activities. For example, for a disabled student who has been determined to be at-risk in language arts, the teacher provides assistance during the time the student is mainstreamed into language arts activities. This in-class teacher works with all children in the language arts class who are eligible and have been selected to receive Title I services. In this manner, there is maximum coordination with the regular classroom teacher since services are provided in the regular classroom and the disabled students are not segregated from non-disabled students when Title services are provided.
- A special education teacher is multiple-funded by special education funds and Title I funds in order to

teach disabled students for a portion of the day and Title I students for a portion of the day. In the portion of the day during which the teacher works with Title I students, the teacher works with some of the disabled students who are eligible and have been selected to receive Title I services. In this manner, there is automatic coordination for those students in special education and Title I since the same teacher provides both services. This teacher also spends significant time with the regular teacher coordinating Title I and regular services for the non-disabled Title I students.

E. Serving Migrant Children

Migrant children are eligible for Part A services on the same basis as other children who are selected to receive services. However, when migrant children arrive at a school during the school year, they may often be unable to receive Part A services because the school has already allocated all its Part A funds. Because LEAs that currently receive migratory children normally do so on a regular basis, LEAs should plan for their arrival and consider their needs when planning, or helping schools to plan, Part A services. Adequate funds should be reserved so that migrant children, who are otherwise eligible for Part A services, receive services even if they arrive in the LEA well into the school year and remain for a limited period of time.

In meeting the needs of migrant children, States, LEAs, and targeted assistance schools have the flexibility under section 1306(b) of Title I, Part C to use Migrant Education Program (MEP) funds interchangeably with Part A funds. This flexibility can be exercised, however, only after MEP funds are first used to meet the identified needs of migrant students that —

- Result from the effects of their migrant lifestyle, or are needed to allow migrant students to participate effectively in school; *and*
- Are not addressed by services provided under other programs, including programs under Title I, Part A.

If MEP funds remain after these unique needs have been met, the MEP funds may be used interchangeably with Part A funds to provide services that are determined to be necessary for the migrant children who are eligible under Part A. Section 1306 does not create a statutory priority to serve migrant children eligible for services under Part A ahead of other Part A-eligible children. Rather, section 1112(b)(1)(J)[3] of Part A makes clear that migrant children eligible for Part A services must be selected on the same basis as other children who are eligible to receive Part A services.

F. Serving Students Who Participate in Educational Choice Programs

Some States have implemented interdistrict open-enrollment options. A student who attends a school in a non-resident LEA through a State open enrollment or other educational choice program could be eligible for Title I services in the non-resident LEA under the circumstances provided below.

1. In creating an open enrollment or other educational choice program, the State, pursuant to State law, treats students participating in the program as "residents" of the LEA in which they attend school. Accordingly, section 1113 of the Title I statute would apply to the new "resident" LEA — i.e., the LEA of choice. In such a case, a student attending a school in a participating attendance area of a new resident LEA and meeting the student selection eligibility criteria would be eligible for Part A services. In effect, the LEA in which the school of choice is located would become responsible for providing Part A services to the student because of the State's declaration of residence.
2. Section 1113(a)(6) of Title I relieves an LEA from identifying and selecting eligible attendance areas if an LEA has fewer than 1,000 children enrolled. In this situation, the LEA may serve any student who, because of participation in an open enrollment or other educational choice program, attends a school in that LEA. The student of course must be identified as eligible and selected to participate in accordance with the LEA and school selection criteria.
3. A student resides in a Title I, Part A program area but chooses, under an open enrollment or other educational choice program, to attend a school in a participating attendance area in another LEA. The student may receive Part A services in the non-resident LEA if the student has been identified as eligible and selected to participate in accordance with the non-resident LEA and school selection criteria.
4. Section 1113(b)(1)(B) of Title I allows funds to be used for eligible children who are in a school that is not located in an eligible Title I school attendance area when the proportion of children from low-income families in that school is equal to the proportion of such children in an eligible school attendance area of that LEA. If students from low-income families attend a school in a non-resident LEA under an open enrollment or other educational choice program, they may be counted to determine

[3]Editor's note: Under the original guidance, the reference was to section 1112(b)(8). This has been revised to reflect the equivalent provision under No Child Left Behind.

whether the school qualifies under section 1113(b). If the school qualifies and the educational choice participants meet the LEA and school criteria for selection, they may be served in that school.

G. Instructional Strategies and Models

Instructional strategies and models in a targeted assistance school must focus on enabling participating students to meet the State's student performance standards. The selection of instructional models to use in a targeted assistance school will be made by each school based on the needs of participating students. Although extended time strategies are strongly encouraged, other strategies such as in-class models and collaborative teaching among Part A and regular classroom teachers can also benefit participating children. Given that the students who will be participating in targeted assistance programs are those who are failing, or most at risk of failing, to meet the challenging standards, thoughtful consideration to program design is essential.

➤ *Extended Time*

Example: Extended Time

An urban school district in a western State operates a child development center that offers three programs:

- Before- and after-school extended-day programming for K-3 students.
- A full-day preschool program.
- A prekindergarten program for three hours a day.

The center is open 10 hours a day, Monday through Friday, and provides services during the summer, on holidays, and on teacher in-service days. Most students who participate before and/or after school also participate in the summer program. The center focuses on developmentally appropriate activities, language arts, and multicultural activities with the goal of preparing Title I participants from non-English-speaking homes for success and full participation in American society.

Example: Extended Time
(Beaverton, Oregon)

Summer time has been identified as an opportunity in this school district to provide additional services to children who attend private schools during the regular school year. More than 50 Title I-eligible students from nonpublic elementary schools enroll each summer in a four- to five-week reading program. Thematic studies provide a framework for reading and writing activities that improve student attitudes and achievement and encourage parent participation in education. The summer school targets students in grades 1-8 who have difficulty reading. The program's goals are to stimulate higher-order thinking skills, overall reading competence and social skills and to engage parents in supporting student learning. Classes meet for three-and-a-half hours a day, four days a week in the same building used by the district-sponsored summer school for special education students. Students use laptop computers to learn worked processing and write reports and they are allowed to take the computer home for additional instruction.

Example: Extended Time
(Omaha, Nebraska)

The Omaha Public Schools and the Omaha Housing Authority have joined forces to provide additional time for students to receive help. The partnership has established study centers at four public housing developments where volunteers provide individualized tutoring to students twice a week after school. The centers are open from 4:30 p.m. to 7 p.m. twice a week. On any typical day, between 30 to 40 students attend each of the four study centers to receive individualized help. Approximately 60 percent of the students attend elementary school, 25 percent attend middle school and 15 percent attend high school.

Example: Year-Round Services
(Socorro Independent School District, El Paso, Texas)

Socorro Independent School District began phasing in year-round education with intersession programs to improve academic achievement and better serve the needs of its students. Every school follows a schedule of 60 weekdays on, 20 weekdays off. Intersession activities occur during the first two weeks of each month-long break. Intersession formats vary but most have acceleration and enrichment activities from 8 a.m. to noon, followed by extracurricular activities in the afternoon. Academic programs focus on tutoring and enrichment activities that use thematic whole-language approaches. The shorter breaks between courses decrease the loss of English skills by many students with limited English proficiency. Participation in the intersessions is voluntary but students who have failed or fallen behind are encouraged to attend. Most schools follow multi-track schedules to serve larger number of students.

Example: Extended Time - Summer

Wanting its Title I participants to participate in all regular school day activities and acknowledging its students' vocational interests, a high school designed its targeted assistance program to use its Title I funds and other supplemental funds to increase the opportunities for Title I students to engage in summer apprenticeships. Teaching and counseling staff provide academic and social support to students placed in positions requiring the application of language and mathematics skills. Most placements are in technical and professional support areas in order to

help students translate academic skills to the job setting and provide a foundation for teacher/counselor support. Summer support emphasizes developing goal structures that help students master the various academic and job functions. When allowable, students earn credit towards graduation for completion of program components.

Example: Extended Time - Summer (South Bend, Indiana)

Increasing the opportunities to learn for at-risk students has made the schools in this urban district look towards the summer for additional instruction time. The district has instituted a five-week summer program that uses a theme-based, interdisciplinary curriculum to help more than 500 students in grades preK-10 succeed in the regular school environment. The summer program targets students who are migrant or non-native English speakers and emphasizes geography, science, the arts, media, and technology. The goals of the summer school include improving basic skills and English language proficiency, expanding awareness of career and cultural opportunities and boosting students' self esteem. Students meet for seven-and-a-half hours a day, Monday through Friday, and spend mornings on academic activities and afternoons in extracurricular activities such as dance or art.

Example: Extended Time - Summer (Charleston, South Carolina)

The schools in Charleston have used the summer to provide additional learning time for at-risk students. Charleston's six-week, science-based summer enhancement program helps students in grades K-5 maintain and improve their skills in reading, writing, and mathematics. The program targets at risk, Title I students who pass their classes but would benefit from the program. The program has two goals: (1) to maintain and improve students' basic skills through experiential learning activities in science-based thematic units, and (2) to improve student attitudes toward school and learning. The program meets for four hours a day, Monday through Friday, for six weeks. Everyday, participants attend classes organized around science themes, work in the school's computer lab, check out books and read in the media center, and spend time writing in their journals.

Example: Extended Time/Technology

An elementary school found that traditional instructional methods were not successful in helping Title I participants in learning math and science. After a small team of Title I and other teachers reviewed many options and discussed them with the entire school staff and LEA administrators, the school decided to use the Internet and a satellite link to communicate via computer and also "in person" with experts at a weather station. The school designed the program for Title I participants as an exciting way to teach math and science concepts. During some lunch times and also after school, students and teacher communicate on a daily basis through technology with oceanic and atmospheric experts. All communication is coordinated with extensive lesson planning by the teachers and experts.

➤ *In-Class Resource Models*

Over the last few years, many LEAs and schools have moved from the pull-out approach (pulling students from the regular classroom for short periods every day or so) to providing resource teachers or other resources in the regular classroom. The in-class support that has been most effective does not resemble a pull-out in the back of the classroom.

Example: In-Class

The Creative Useful Experiential (Project CUE) instructional model is used in Coloma Community Schools (MI) to integrate special education and Title I students into the regular classroom setting by: (a) utilizing the thematic approach to make the curriculum more interesting to students, (b) using of teacher collaboration to ensure the needs of all children are being addressed, and (c) using of a variety of experience-based classroom activities. Teacher teams collaborate to plan a theme-based curriculum for each classroom. A teaching team is made up of a regular education, a special education, and a Title I teacher. Specialist teachers are scheduled into 4 or 5 classes a day to ensure that the needs of the special education and Title I students are met. Cooperative planning between all team members allows for activities designed to address the needs of a wide range of students. Activities that incorporate a variety of learning styles allow students to perform successfully. The inservice required for the implementation of this program includes training in cooperative learning, strategic instruction, co-teaching, literature-based learning, thematic instruction, hands-on activities, consensus decision-making, outcome-based curriculum, portfolio/classroom assessments, and classroom observation of model teaching.

Example: In-Class — "Push-In" As A Delivery Model

Eliminating the traditional "pullout" program, an urban school district in Arizona with a diverse student population instituted a "push-in" delivery of additional services for Title I students. Under the supervision of the regular classroom teacher, a Title I teacher or paraprofessional works with small groups of children, some of whom, at times, may be non-Title I. This structure minimizes disruption and negative labeling while it provides direct services to Title I students and incidental assistance to their classmates who might need assistance on a particular concept.

In each Title I school, a Title I program facilitator (a certified teacher and in many cases a former Title I teacher) provides every classroom teacher with pedagogic support, including modeling instructional strategies and other professional advice, support, and guidance. Their goal is to help every teacher establish and maintain classroom learning conditions that stimulate and accelerate Title I students' learning.

➤ *Pull-Out and Replacement Programs*

Part A requires that targeted assistance programs use effective teaching strategies that give primary consideration to providing extended learning time and that help provide an accelerated, high-quality curriculum. Because there are situations in which a school is unable to provide extended-time services or in which schools have had success by conducting replacement projects with students, pull-out and replacement models are other allowable strategies.

Example: Pull/Out — Reading Recovery

Many schools throughout the country have implemented Reading Recovery, an early intervention program that enables the lowest 20 percent of first graders "at risk" of reading failure to develop effective strategies to read at average classroom levels. Children are selected through a battery of individually administered diagnostic tests. They receive a daily 30-minute lesson that incorporates a variety of reading and writing experiences designed to help them develop effective strategies for reading and writing. Each day, children move through a lesson sequence that involves the reading of familiar materials, the composing and writing of a story, and the introduction and reading of a new book. Although Reading Recovery lesson follow a framework, every lesson is unique because the Reading Recovery teacher closely monitors each student's progress and makes ongoing teaching decisions based on that student's current use of reading and writing strategies. This pull-out program lasts approximately 15-20 weeks and supplements regular classroom reading instruction. Once children complete the Reading Recovery program, they often need no further remediation in reading.

Q4. Are replacement programs allowable under Part A as they were in previous authorization periods?

A. A replacement program provides Part A services for a period of time that exceeds 25 percent of the time — computed on a per day, per month, or per year basis— that a participating child would, in the absence of Part A funds, spend receiving instructional services from a teacher of a required or elective subject who is paid with other than Part A funds. Part A replacement programs are generally provided in a different classroom setting or at a different time than would be the case if these children were not participating in the Part A program and replace all or part of the course of instruction regularly provided to Part A participants with a program that is designed to meet participants' special educational needs. Replacement programs are still allowable under Title I. However, the statute strongly encourages strategies that include extended learning time and accelerated curricula. If an LEA operates a replacement program, the LEA must provide from funds other than Part A either the FTE number of staff that would have been provided for the services replaced by the Part A program or the funds required to provide the number of staff.

➤ *Incidental Inclusion*

Because of the instructional method, setting, or time of a particular Part A service, it is not always reasonable or desirable for a school to serve only children who have been selected to participate in a Part A program. This may be particularly true if a school is providing Part A services in the regular classroom. A school may provide, on an incidental basis, Part A services to children who have not been selected to participate in the Part A program. This would be allowable only if the Part A program —

- Is designed to meet the special educational needs of the children who are failing, or most at risk of failing, to meet the State's challenging student performance standards and is focused on those children; and
- The inclusion of non-Title I, Part A children does not--
  - Decrease the amount, duration, or quality of Part A services for Part A children;
  - Increase the cost of providing the services; or
  - Result in the exclusion of children who would otherwise receive Part A services.

H. Comprehensive Services

If health, nutrition, and other social services are not otherwise available to participating children in a targeted assistance school, and the school, if appropriate, has conducted a comprehensive needs assessment and established a collaborative partnership with local service providers, and if funds are not reasonably available from other public or private sources, then a portion of Part A funds may be used to provide these services, including —

- Provision of basic medical equipment, such as eyeglasses and hearing aids.
- Compensation of a coordinator.
- Professional development necessary to assist teachers, pupil services personnel, other staff, and parents in identifying and meeting the comprehensive needs of eligible children.

I. Assignment of Personnel

To promote the integration of Part A staff and participants into the regular school program and overall school planning and improvement efforts, Part A-paid personnel may —

- Assume limited duties that are assigned to similar personnel paid with other funds, including duties beyond classroom instruction or that do not benefit Part A participants, as long as the amount of time spent on the limited duties is the same proportion of total work time as that for similar personnel at the same school.
- Participate in general professional development and school planning activities.
- Collaboratively teach with regular classroom teachers if the collaborative teaching directly benefits participating children.[4]

The purpose of this provision is to involve Part a staff in shared responsibilities to promote a coherent and well-coordinated program for participants. The provision is not meant to result in Part A staff being assigned a disproportionate share of special duties at a school. In assigning Part A staff to such duties, a school and LEA should ensure that the Part A program is not harmed.

[4]Collaborative teaching was explicitly authorized in Section 1115(d)(2) of the 1994 Improving America's Schools Act, which is the basis for this guidance. In the 2001 No Child Left Behind Act, Congress removed this provision, an action that could be construed as disapproving of this practice. However, one could reasonably argue that collaborative teaching is allowable under the statute anyway, as long as the in-class, Title I-funded services are focused on the special needs of eligible children, as explained in the policy letter on p. G-4212.

UNITED STATES DEPARTMENT OF EDUCATION
[COLLABORATIVE TEACHING IN TARGETED ASSISTANCE SCHOOLS]

Feb. 27, 1997

Memorandum To State Title I Coordinators:

In response to several recent inquiries we have received concerning the use of Title I-paid staff in collaborative teaching arrangements in targeted assistance schools, I would like to provide the following guidance. The inquiries relate to the use of Title I-paid staff in non-Title I related team teaching arrangements.

Instructional strategies and models in a targeted assistance school must focus on enabling participating students to meet the State's student performance standards. Given that the students who will be participating in targeted assistance programs are those who are failing, or most at risk of failing, to meet those challenging standards, thoughtful consideration to program design is essential. Since Title I funds are not intended to be used as general aid to the regular classroom, the strategies used in targeted assistance schools for providing Title I services must directly benefit Title I participants. Although the Title I statute and we encourage the use of strategies that do not pull students unnecessarily from the regular classroom, strategies such as collaborative teaching must be carefully designed and implemented to ensure that the educationally needy receive supplementary services. Merely providing a Title I-paid teacher for a regular classroom that has some Title I participants to team-teach with the regular teacher—resulting in, for example, a 15:1 student/teacher ratio instead of a 30:1 student/teacher ratio—is not permissible. Although reduced student/teacher ratios might benefit both Title I and non-Title I participants, such a strategy does not provide supplemental services that are specifically designed to meet the Title I participants' educational needs.

A collaborative teaching arrangement involving Title I-paid staff is permissible if the Title I staff's activities are planned to help the Title I participants. For example, in a targeted assistance classroom in which there are Title I participants with special needs in reading, a reading specialist paid with Title funds might work together with the regular teacher. Not only might the Title I teacher work collaboratively with the regular teacher to design better reading lessons for the Title I participants, but the Title I teacher might also conduct demonstration lessons — showing the regular teacher a more effective way to each a particular reading skill — for the entire class. The regular teacher would thus begin to use the more effective teaching strategy, and the Title I teacher would provide whatever other reinforcement is necessary to the Title I participants. It minimizes disruption, helps the regular teacher work better with low-achieving students, and provides Title I participants with supplemental services from the Title I-paid teacher. On page 17 [see *Title I Handbook* p. G-4209] of the "Targeted Assistance Schools" chapter in the Title I Policy Guidance are two other examples of collaborative teaching strategies specifically designed to benefit Title I approaches. Regardless of the collaborative teaching design in a targeted assistance school, it is imperative that when Title I-paid staff are involved, their involvement be designed to directly benefit Title I participants.

I hope this provides sufficient guidance to assist you in working with your Title I local educational agencies and schools.

Mary Jean LeTendre, Director
Compensatory Education Programs

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