

TABLE OF CONTENTS

	<u>Page Number</u>
4.1.0 General Statement	IV-1
4.2.0 Basic Concepts	IV-2
4.3.0 General Requirements for Parental Involvement	IV-6
4.4.0 Establishing Project Area and Project School Advisory Councils	IV-7
4.4.1 Project Area and Project School SAC Membership Requirements	IV-9
4.4.2 Eligibility to Vote in a Project Area or Project School SAC Election	IV-11
4.4.3 Nominations for SACs	IV-12
4.4.4 How to Attract SAC Members	IV-12
4.4.5 Election Procedures for SACs	IV-16
4.5.0 District Advisory Councils	IV-16
4.5.1 DAC Membership Requirements	IV-17
4.5.2 Eligibility to Vote in a DAC Election	IV-20
4.5.3 Nominations for DACs	IV-20
4.5.4 How to Attract Members	IV-20
4.5.5 Election Procedures for DACs	IV-20
4.6.0 Identification of Parents of Title I Children	IV-26
4.7.0 Notice of Nominations and Elections	IV-28
Availability of Names of Advisory Council Members	IV-28
4.8.0 Responsibilities and Functions of Advisory Councils	IV-28
When Advisory Councils Must Give Their Consent	IV-37
4.9.0 Advisory Council Access to Information	IV-38

TABLE OF CONTENTS (Continued)

Page Number

4.10.0	Advisory Council Access to Information	IV-39
4.10.1	Description of Training Program in LEA Application	IV-42
4.10.2	Training that Involves Travel	IV-43
4.11.0	Which Advisory Council Activities Can Be Paid for By Title I	IV-44
4.12.0	Workshops on Parent Involvement	IV-46
4.13.0	Involvement of Individual Parents	IV-46
4.14.0	Complaint Resolution Process	IV-48
	Where to File a Complaint	IV-48
	Contents of the Complaint	IV-49
	Complaint Resolution Process at the LEA Level	IV-50
	Complaint Resolution Process at the SEA Level	IV-51
	Appealing to the Assistant Secretary of Elementary and Secondary Education	IV-52
	Complaint Resolution Process of the Chosen Official	IV-53
	Administrative Appeal to the Assistant Secretary of Elementary and Secondary Education	IV-54
4.15.0	Summary of Requirements on Parent Involvement	IV-55

CHAPTER 4
PARENT ADVISORY COUNCILS

4.1.0 General Statement

In 1965, Congress enacted the Elementary and Secondary Education Act commonly known as ESEA. The largest funded component of this act was title I, designed to provide financial assistance in order to meet the particular education needs of children who were educationally deprived and who resided in areas having high concentrations of children from low income families. While Title I ESEA has since been amended, the basic "declaration of policy" remains the same as most recently stated in the Education Amendments of 1978 (Public Law 95-561):

In recognition of the special education needs of children of low-income families and the impact that concentration of low-income families have on the ability of local education agencies to support adequate educational programs, the Congress hereby declares it to be the policy of the United States to provide financial assistance (as set forth in the following parts of this title) to local educational agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means (including preschool programs) which contribute particularly to meeting the special educational needs of educationally deprived children....(Sec. 101).

Each of the key words or phrases in the declaration of policy express the intent of Congress.

- Support of Adequate Education Programs to Meet Special Education: Most financing of local education agencies (LEAs) come from local or state revenues. However, LEAs with high concentration of low-income families may not be able to support adequate educational programs. Hence, financial assistance is provided by the Department of Education to states on the basis of incidence of low-income families and, in turn, to counties, and to LEAs. Applications from LEAs have to be approved by the State Education Agencies (SEAs). LEAs, however, may not use such title I funds for "general aid." Rather these funds must provide for adequate education programs which meet the particular education needs of children from areas with concentration of low-income families.

● Expand and Improve: Title I ESEA funds must be used by LEAs to expand and improve educational programs and services for students eligible to be served under Title I ESEA. While LEAs must provide all children with their basic educational program, title I funds can only be used to provide extra or supplemental services to meet the particular education needs of educationally-deprived children who are otherwise eligible. Title I ESEA funds must also be used to improve the quality of educational programs for educationally-deprived children through proper planning and program design.

● Educational Programs: The supplemental educational programs funded under title I must be designed to meet the specific educational needs of children selected for participation in the program. The programs must be of sufficient size, scope, and quality with stated performance objectives for each project, based upon an assessment of the need of eligible students. Supportive services are clearly related to the educational needs of children being served and are not available from other funding sources.

● Educationally-Deprived Children in Areas with Concentrations of Children from Low Income Families: The intended beneficiaries of Title I ESEA educationally-deprived children who reside in school attendance areas with high concentrations of children from low-income families. Eligible school attendance areas are identified and ranked on the basis of family income level or directly-related information. With a few exceptions, those eligible attendance areas or schools with the highest percentage or numbers of children from low-income families are selected for ESEA title I funding. Individual children within an eligible attendance area or a school are selected on the basis of their individual educational needs.

4.2.0 Basic Concepts

Title I ESEA requires that the parents of educationally deprived children be involved in the planning, development, implementation and evaluation of title I projects. The mechanisms to accomplish such involvement are district and project area advisory councils with a majority of members who are parents (Sec. 125, Sec. 124(j)).

The first explicit, minimum standards for parental involvement in title I

ESEA were set in 1971 and included the establishment of district advisory councils. In 1974, amendments to ESEA required project area or project school advisory councils, as well as the district-level councils. The Education Amendments of 1978, P.L. 95-561, included even stronger parental involvement requirements. There are also specific requirements for the involvement of individual parents in ESEA title I (Sec. 124(j)).

The main focus of this chapter is to outline specific requirements for and ways to establish and operate advisory councils. The following is a brief summary of concepts and terms which are essential to understanding the role of advisory councils in title I program.

- School Attendance Area - In most school systems the school district is divided into separate neighborhoods or zones. Children who live within each neighborhood or zone are assigned to attend a particular school serving their grade. These neighborhoods or zones are called "school attendance areas." Children are considered to be residing in the school attendance area of the school to which they are assigned or would be assigned if they were not attending a private school (Sec. 198(a)(13), 116a.4).

- Eligible School Attendance Area - A neighborhood or zone in which a sufficiently high concentration of children from low-income families reside to be eligible for services supported with title I funds is called an eligible school attendance area. (See Chapter 1 on Designating School Attendance Areas for the various methods of determining "a high concentration of children from low-income families.") (Sec. 122(a)(1), 116a.4(b))

- Educationally Deprived - Educationally deprived is a term used in the title I law and regulations to describe a child whose achievement is less than expected of children of the same age (116a.4(b)).

- Project Area - A project area is an eligible school attendance area that has been selected by the LEA as an area from which children are to be selected to participate in a title I project (116a.4(b)).

- School Serving A Project Area - Any school providing educational

services to children living in the project area, including non-public schools, is considered to be a school serving the project area (Sec. 125(a)(3)).

- Eligible School - Title I contains an exception for those public schools that are not located in an eligible school attendance area but that have a high concentration of children from low-income families actually attending the school. A school fitting this description is called an eligible school. Title I funds may be used for educationally deprived children actually attending the eligible school (Sec. 122(b), 116a.4(b)).

- Project School - An eligible school that is selected by the LEA to operate a title I project for educationally deprived children who actually attend the school is called a project school. Sometimes the school building which houses a project area's title I project is also called a project school. In this chapter, the term "project school" refers only to an eligible school and not to a school in a project area (116a.4(b)).

- Eligible But Not Participating Areas Or Schools - Eligible school attendance areas and eligible schools may not be picked as project areas or project schools for a variety of reasons. (See Chapter 1 on "Designating School Attendance Areas".) When an eligible area or eligible school is not picked by the school district to be a title I project, it is called an eligible but not participating area or school (Sec. 125(a)(1)(c), 116a.152).

- District Advisory Council (DAC) - The advisory council required in each school district which receives title I funds. The district advisory council is responsible for advising the school district on the planning, operating and evaluating of all its title I projects. The membership is elected and a majority of its members must be parents of children participating in title I programs (Sec. 125(a)(1), 116a. 151(a)).

- Project Area And Project School Advisory Councils (SACs) - That advisory council required in most buildings served by a title I project. The situations where building level advisory councils are not required, will be discussed later in the chapter. The project area and project school advisory councils advise their school and the district on the planning, operating, and

evaluating of the project housed within their school building (Sec. 125(a)(2), 116a.151(b)).

- Local Educational Agency (LEA) - Local educational agency refers to a board of education or other legal authority having administrative control over public education in a county, township, or school district (Sec. 198(a)(10), 116.5).

- State Educational Agency (SEA) - State educational agency refers to the agency whose primary responsibility is for supervising public elementary and secondary education in the state (Sec. 198(a)(17), 116.5).

- Participating Children - Children selected to receive title I services during the current project year (116.5).

- Parent - The term parent includes natural parent, parent by marriage, adoptive parent, a legal guardian, or any other person who may be acting in the role of a parent., e.g., grandparent (116.5).

- Non-Resident Parents - Parents whose children reside in an eligible attendance area or attend an eligible school but who are not themselves a resident of the school district are non-resident parents.

- Needs Assessment - Needs assessment is a process of identifying the specific educational needs of children within a school district as well as the broad needs of the school district such as which grade span and which subject area are to be served (Sec. 124(b)).

- Evaluation - Evaluation is a general term used to describe the determination of progress or achievement. In title I, it is the process by which student progress is measured on an ongoing and/or annual basis. It is also an assessment of the extent to which a project's overall objectives are achieved (Sec. 124(g)).

Examples and model procedures used throughout this chapter have been derived from parent handbooks used around the country and from discussions with

individuals working in the field. Particular sources for each example and model procedure will be indicated.

4.3.0 General Requirements for Parental Involvement

Title I ESEA Secs. 124(j), 125

H. Rept. 95-1137, pp. 27-28

H. Rept. 95-1753, pp. 257-259

H. Rept. 96-338, pp. 6-8

The legislative history of a law is the written record of the congressional debate and actions that precede its passage. Generally, when the letter of the law is unclear, the persons or agencies affected look to this history for the intent of Congress. The legislative history of the Education Amendments of 1978 (P.L. 95-561), the current authority for title I, demonstrates that Congress wanted stronger parental involvement than that required prior to 1978. Congress made clear that the title I requirements for parental involvement must be met in ways that do, in fact, achieve their purpose. (116a.150, H. Rept. 95-1137, p. 27-28, H. Rept. 95-1753, p. 257-259, H. Rept. 96-338, p. 6-8)

For example, an LEA must establish an advisory council for the entire district. Each school in the district may have a representative on the council, but that is not a requirement. The legislative history explains that a representative from each school of a large district could produce a council too large to effectively carry out its responsibilities (H. Conf. Rep. 95-1753 p. 257). The guiding principle for establishing councils is representative parental involvement (Sec. 125(a)(1), 116a.151(a), H. Rept. 95-1753, p. 257).

Generally, an LEA must establish an advisory council for the entire district and one for each project area and project school. At least a majority of the members of each council must be parents of children being served by title I programs. Each council is responsible for advising its respective district, area or school, in the planning, operating and evaluating of its title I projects. Like most general statements, this one has several exceptions and variations. These will all be explored in the specific requirements sections of this chapter (Sec. 125, 116a. Subpart 1).

4.4.0 Establishing Project Area and Project School Advisory Councils
(Sec. 125 (a)(2),(b), 116a.151(b), 155(b), 157, 159)

An LEA must establish an advisory council for each eligible school attendance area and each eligible school within its district that has been chosen to be a project area or a project school. Project area and project school parent advisory councils are often referred to collectively as school advisory councils or SACs. The basis for establishing project area and project school advisory councils is different, but both councils operate exactly the same way. They will be referred to as SACs throughout the remainder of the chapter unless the subject being discussed requires that they be given separate treatment. Additionally, if a title I project serves only private school children in an eligible area because a non-federal program provides comparable services exclusively to public school children, the LEA must still establish a SAC. SACs are responsible for actively advising the project area or project school in the planning, operating and evaluating of the area or school's title I project. A state educational agency (SEA) cannot approve an LEA's application for title I funds unless this requirement has been met.

Exceptions: SACs not required:

There are several instances in which an LEA is not required to establish an advisory council for a project area or a project school:

- LEAs with only one attendance area: An LEA is not required to establish a SAC for its project area if the LEA has only one attendance area. The LEA has the option to have one area council that will also serve as the advisory council for the entire district, without regard to the number of schools serving that area (116a.154(d)).

- LEAs with limited Title I staff and limited Title I student body: An LEA is not required to establish an advisory council for a project area or project school if the area or school employs one or less full-time equivalent staff member paid out of title I funds and serves fewer than 40 students in its title I program. Project areas and schools enrolling 40 or less students in

their title I program will not be required to have a parent advisory council even if they have more than one staff member being paid out of title I funds so long as the combined work hours of the staff members are less or equal to the number of hours a full-time staff member would work (that is, the school has only one full-time equivalent staff person). It is important to note that in order for the LEA to waive the establishment of an advisory council for a project area or project school, both requirements -- a small staff and small number of students enrolled -- must be met. An advisory council must be established if only one of the requirements is met (Sec.125(a)(2)(B), 116a.155(c)).

Example/Illustration

Examples of the limited staff/limited student body exception would be a follows or a project area or project school where 40 hours is considered to be full time:

- | | | | |
|----|--|---|--|
| 1. | Title I teacher A works 10 hrs/wk.
Title I teacher B works 10 hrs/wk.
Title I aide A works 10 hrs/wk. +
Title I aide B works 10 hrs/wk. | 40 or less
students
enrolled =
in Title I
project | NO
ADVISORY
COUNCIL |
| | Total Title I staff time = 40 hrs/wk. | | ADV.
COUN.
<u>MUST</u> BE
FORMED. |
| 2. | Title I teacher A works 40 hrs/wk. + | 40 or less students
enrolled in the =
Title I project | NO
ADVISORY
COUNCIL |
| | Total Title I staff time = 40 hrs/wk. | | |

3. Title I teacher A works 20 hrs/wk.	40 or less	ADVISORY
Title I teacher B works 10 hrs/wk.	students	COUNCIL
Title I aide A works 10 hrs/wk.	+ enrolled in	+ <u>MUST BE</u>
Title I aide B works 10 hrs/wk.	Title I	FORMED
	project	
Total Title I staff time = 50 hrs/wk.		

4. Title I teacher A works 10 hrs/wk.	41 or more	ADVISORY
Title I teacher B works 10 hrs/wk.	students	COUNCIL
Title I aide A works 10 hrs/wk.	+ enrolled in =	<u>MUST BE</u>
Title I aide B works 10 hrs/wk.	the Title I	FORMED
	project	
Total Title I staff time = 40 hrs/wk.		

As stated earlier, the legislative history calls for stronger parental involvement in title I ESEA programs. The two exceptions to the requirement for SACs are consistent with that purpose. If DACs and SACs were to compete for the same limited pool of parents, Congress felt that parental involvement would be less effective (H. Conf. Rept. 95-1753 pp: 257-8).

Another instance where a SAC may not be required is when, for example, three districts file a joint title I application because none are big enough to support a project on their own. If the needs assessment show that participating children will be selected from all three districts, but that district three only has 10 children who will participate and it is determined that a title I teacher will spend 15 hours a week with the 10 children in district three, district three will not be required to establish a SAC. District three is not required to establish a SAC because it is serving less than 40 students and the title I teacher is working less than full-time. The residents of district three, however, will be able to vote and be candidates for the DAC that serves the joint applicant districts. The rest of this section sets out the membership requirements and the election procedures for SACs.

4.4.1 Project Area and Project School SAC Membership Requirements (Sec. 125(a)(2)(A))

The majority (51 percent or more) of the members of a SAC must be parents of children who are currently participating or who will participate in the title I project during the next project year. For example, if a SAC has 8 members at least, 5 of the members must be parents of children participating in the title I project. Anyone who is a parent of a participating child (a child participating in a title I program) or a child who will be participating may be counted as a majority member of the SAC. Accordingly, the majority members may include principals, teachers, other school employees, education-related paraprofessionals and husbands and wives, so long as they are parents of a participating child and elected, not appointed to the SAC. Once a parent is elected to the majority, the parent will continue to be counted as a majority member for the duration of his or her term even though his or her child is no longer title I eligible or is no longer attending the school serving the project area or the project school. The remaining members of the SAC who must also be elected may include teachers at a school serving the project area, teachers at a project school, parents of children attending eligible schools and any other residents of the LEA's school district. The residence of teachers at a school serving the project area or teachers at project schools in no way affects their eligibility to be considered for membership (Sec. 125(a)(2)(A)(i), (a)(3), 116a.156, 152(a), 158, H. Rept. 95-1753, p. 257-8).

The legislative history of P.L. 95-561 explains that the only restriction placed on who can be a SAC member is the 51 percent majority requirement. The technical amendments to the Education Amendments of 1978 dropped the residency requirement because it may prevent otherwise eligible individuals from being members of either the DAC or the SAC (H.Rept. 96-338 p.7, 116a.156(a), 158).

Exception: 75 or More Children Served

A project area or project school that services 75 or more title I children must have at least 8 members on its SAC. These members are to serve two-year terms and they may be reelected. The SAC members are to elect officers and they are to "meet a sufficient number of times per year" (Sec.125 (a)(2)(C)). "While sufficient number of times" is not spelled out in the law, the legislative history and regulations do indicate that the meetings should be scheduled so that the advisory councils can become actively and effectively involved in the

planning, operating and evaluating of title I ESEA programs (H.Conf.Rept. 95-1753 p.258, 116a.156(c)).

Examples/Illustration:

(Sec. 125(a)(2)(A), 116a.156)

On a 5 person SAC the membership looks like:

Parents of children enrolled in the project area or project school's title I project	+	two additional members who may also be parents of title I children <u>or</u> they may be teachers who teach in a school serving the project area or who teach in the project school <u>or</u> they may be any other person who lives in the LEA's district.
--	---	---

4.4.2 Eligibility to Vote in a Project Area or Project School SAC Election
(Sec. 125(a)(2)(A)(ii), 116a.157)

Although a variety of people may be members of SACs, only parents may vote in the election of those members. Specifically, in a project area only parents of school-age children who live in the project area may vote for SAC members. Parents of school age children include the parents of private school children. Parents of preschool children may also vote if the LEA offers a title I preschool program. In a project school, however, only parents of children attending the project school may vote in the school's SAC election. The reason for this restriction on the project school SAC election is that only children that attend the project school may be selected to participate in the school's title I project. Since children attending private schools could not be selected for a project school title I program, their parents may not vote in the SAC election.

4.4.3 Nominations for SACs (116a.157(c))

It is important to identify which candidates are parents of participating children before the SAC election so that the election can be organized to meet the 51 percent majority requirement. Each LEA, in consultation with its DAC, must establish procedures for the nomination of persons who may be considered for election to a project area or project school advisory council. Before nominations for project area SAC elections can be made, however, each candidate must be identified as 1) a parent of a child to be served by the project who has consented to be so identified, 2) a teacher at a school serving the project area, or 3) a resident of the school district. Similarly, for a project school, each SAC candidate must be identified as 1) a parent of a child to be served by the project who has consented to be so identified, 2) a teacher at the project school or 3) a resident of the school district. (See Section 4.6.0 of this chapter on the Identification of Parents.)

4.4.4. How to Attract SAC Members

In the beginning of the year, schools usually hold an "open house." The State of Washington suggests that the local title I ESEA director take this opportunity to talk about SAC activities. The director could ask opinions of those in attendance and tell them when the next meeting is scheduled. Handing out the SAC schedule for the next two or three months may be one way to attract interest.

After the title I staff has contacted parents of children who have been selected to participate in the title I project and these parents have agreed to be identified as parents of title I children a committee of parents can be used to make personal contact with the "identified" title I parents. A separate committee can be used to make phone calls. (See Sec. 4.6.0 of this chapter on the Identification of Parents)

In one school district, the DAC was well-organized but SACs did not yet exist. To establish them, the principal in each school housing a title I project asked two or three parents with children in the program to serve as an ad hoc recruiting committee and gave them a list of all parents willing to be

identified as parents of title I students. The recruiters each contacted a number of them - by phone and home visits - to explain the need for an advisory council and to obtain their consent to be nominated for SAC membership. A title I open house was then held. During the open house parents who attended elected SAC members.

Model Procedures/How to Start SACs:

- Three states offer the following basic guidelines for starting SACs:

Florida:

1. Interested parents get together with the principal and/or title I staff to plan initial organizational activities.
2. Obtain the names of parents who are willing to be identified as parents of title I students and contact them by letter and phone.
3. Hold a start-up meeting with those parents and other interested individuals at which time the title I parents present will elect the initial membership of the SAC.
4. Call a PAC meeting to get organized. Appoint interim officers and establish bylaws and nominating committees.
5. At next meeting, adopt bylaws, elect officers, and start planning the schedule of activities for the coming year.

Maryland:

1. Notify parents that their children will receive title I services.
Describe the services.
2. Arrange early conferences for the parents in order that the teacher or principal may answer individual concerns, explain test scores, and seek parental support.

3. Inform all parents of the ways in which title I services enhance the school program.

4. Meet with parents to plan the first SAC meeting.
 - a. Set a date which is convenient for parents and principal.
 - b. Schedule a meeting time which is most convenient for parents in the school.
 - c. Select a comfortable location in the school.
 - d. Send out flyers to invite all parents to the meeting. Be sure the purpose of the meeting is clearly spelled out in the notice. If child care or transportation is offered, include this also. Ask for RSVP's.
 - e. Call identified parents of title I children a few days before the meeting. Perhaps teacher assistants or parent aides could make the calls. Personal contact always results in better attendance.
 - f. Consider additional ways of inviting parents to the meeting (for example, principal's newsletter, local newspapers, public service announcements).
 - g. Plan light refreshments and decide who will provide them.
 - h. Consider transportation needs for parents (for example, paid community members, volunteer parents, local high school child development students, or college students could provide transportation for those people who have no other way to attend a meeting).
 - j. Plan an interesting, realistic agenda, for example:
 - (1) An overview of the year's project (what title I expects to do for the children this year).
 - (2) An introduction to the title I resource staff explaining the ways in which they aid the children.
 - (3) A demonstration of recent accomplishments of title I children.
 - (4) Small group discussions to give parents an opportunity to express concerns and questions about title I and their desires for PAC activity during the year.
 - (5) Recruitment of parents who will agree to devote some time and energies to the program. Share with them all possible ways they can be involved in title I efforts.

- (6) Recruitment of parents who will agree to volunteer for active SAC membership. This is the time to emphasize the legal requirement to have elected SAC representation. This is the time to gather the names from whom the active PAC membership will be elected. Parents should be reassured that the staff will help them learn and fulfill their duties. Set a meeting date for elections.
- (7) Refreshments. (The "Parent Advisory Council Handbook", Maryland State Department of Education)

Washington:

Consider the following questions:

- Is a calendar of meeting dates planned in consultation with and provided to the advisory council?
- Are meetings being held at appropriate times and places?
- Are evening meetings necessary?
- Are separate day/evening meetings necessary to accommodate everyone's interest and work schedule?
- Are meetings being held in comfortable and non-threatening locations?
- Are the meetings informative and friendly?
- Are advisory council members reminded of meetings by mail or by phone?
- Are babysitting and transportation arrangements made for those who need them?
- Is there an opportunity for all parents to speak their minds at each meeting? Is there a "free speech" time on the agenda?
- Do the meetings end with a feeling of satisfaction and/or accomplishment?
- Are meetings too lengthy?
- Are advisory council members asked when they wish to meet again and agree upon a date before they leave the meeting?
- Are minutes of the previous meeting and agenda for the next meeting provided so that adequate time can be given for personal review and preparation?

4.4.5 Election Procedures For SACs (Sec.125(a)(2)(A)(ii), 116a.157,
99.30, 116a.158)

The only statutory requirement concerning SAC elections is that only parents can elect the council members. The regulations provide some general guidelines for DAC and SAC election procedures. Each will be explained more fully later on in this chapter. The regulatory guidelines are:

- 1) To be considered for election to a SAC as a title I parent a title I parent, must give his/her written consent to be identified as a title I parent.
- 2) The election procedures should not restrict the rights of parents to elect the persons they choose to be members of the advisory council other than those required by the law and regulations.
- 3) The LEA must provide timely and appropriate notice to the parents and general public in the appropriate school attendance area of the time, place and method of nomination and election of council members.

4.5.0 District Advisory Councils(DACs) (Sec. 125(a)(1), (b), 116a.151
(a), 159)

In its application for title I ESEA funds, an LEA must demonstrate that it has established an advisory council for its entire school district. An LEA must also show that this council has actively advised the LEA in the planning, operating and evaluating of its title I programs and projects. A state educational agency (SEA) cannot approve an LEA's application for title I funds if the LEA has failed to show that it has an active, functioning advisory council at the district level.

The advisory council at the district level will be referred to as the DAC throughout the remainder of this chapter. There are no exceptions to the requirement that every LEA establish a DAC. There are, however, various ways in which members may be elected to the DAC and there are a variety of individuals who may be members of a DAC. This section sets out the membership requirements and the election procedures.

4.5.1 DAC Membership Requirements (Sec. 125(a)(1))

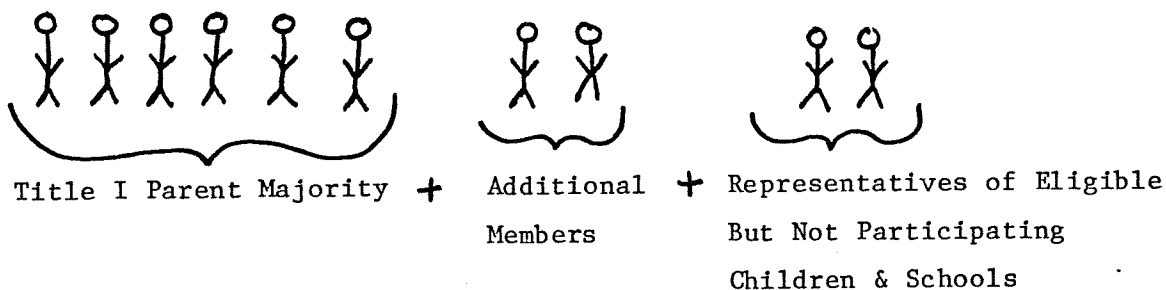
Like members of SACs, the majority (51 percent or more) of the members of the DAC must be parents of participating children or children who will participate in the next year's title I program. Anyone who is a parent of a title I child may be counted as a majority member of the DAC including parents of private school children who participate in the title I project. Like SACs, DACs may include as majority members, husbands and wives, school employees, teachers, principals, and education-related paraprofessionals, so long as they are parents of title I children and are elected, not appointed to the DAC. (Sec. 125(a)(1)(A), CFR 116a.152(a), 158)

Unlike SACs, the DAC must reserve at least two seats for representatives of children and schools eligible to be served by, but not currently participating in title I projects. These representatives are elected by parents of school-age children in areas and schools that are eligible but unserved by title I. These reserved seats should come from the minority membership of the DAC that is not required to be composed of parents of children to be served by title I. Anyone who is eligible to be a DAC member may be elected a representative of eligible but unserved children and schools, including parents of participating children. This is the only instance where a parent of a title I child would not be counted as a majority member (Sec. 125(a)(1)(c), 116a.152(b), H. Rept. 96-338, p.7).

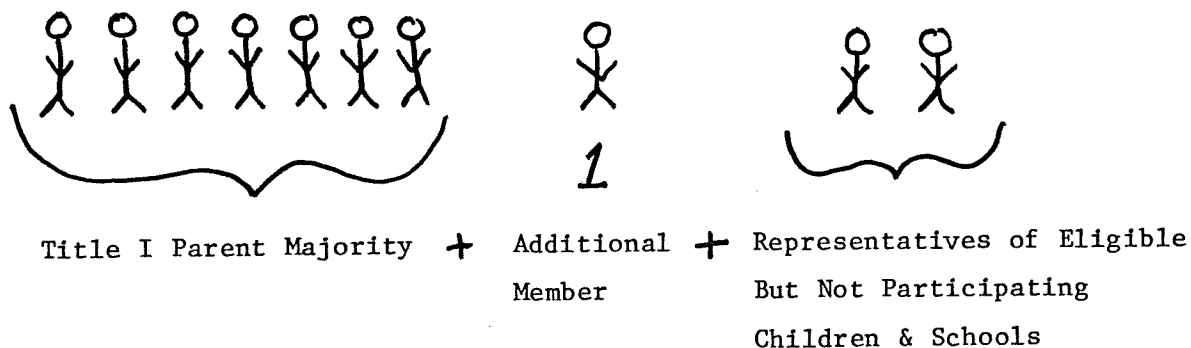
The legislative history explains that the membership requirements for the DAC are intended to strike a balance between the immediate concerns of parents of children currently participating in title I programs and the long term concerns of parents of children who are eligible but unserved by the title I program (H.Conf.Rept. 95-1753 p.257). Basically, there was concern that eligible attendance areas and eligible schools would never have a chance to become project areas or project schools unless their interests were represented on the DAC. It is important to note, however, that it was never intended that every eligible but unserved area and school have a representative on the DAC. The two or more representatives of eligible but unserved children and schools represent all the eligible but unserved areas.

The DAC may include additional members within its non-majority share so long as the required parent majority and the eligible but unserved children and schools are adequately represented. Anyone who is a resident of the district may be elected to the DAC. DAC membership is also open to teachers at schools serving a project area or at project schools and to parents of children residing in eligible attendance areas or attending an eligible school even if their residency is outside the area or district (Sec. 125(a)(1)(B), (a)(3), 116a.152(c)).

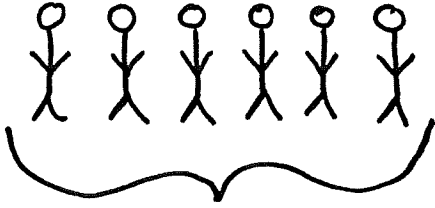
The regulations require that each LEA in consultation with its DAC determine the number of members to be elected to the next year's (or term's) DAC. If, for example, the DAC and LEA determine that 10 people is a good working size DAC, the ultimate DAC will look something like this:
(Sec. 125(a)(1), 116a.158)



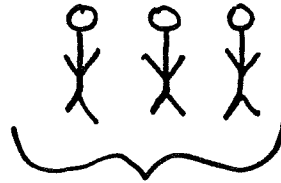
OR THIS:



OR THIS:

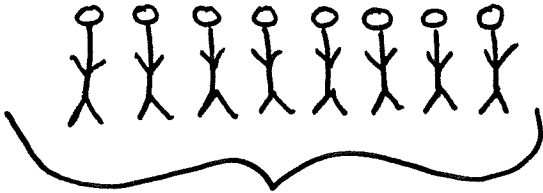


1

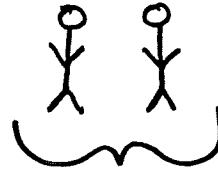


Title I Parent Majority + Additional Member + Representatives of Eligible But Not Participating Children & Schools.

OR THIS:



Title I Parent Majority



Representatives of Eligible But Not Participating Children & Schools.

+

Notice that in each example there are always at least six title I parents (the majority of the members) and two representatives of eligible but not participating children and schools. The LEA and DAC can decide whether there will be more than two representatives of eligible but not participating children and schools but it is up to the voters (parents) to decide whether there will be any additional members who are not title I parents.

So long as an advisory council has enough members to represent the community being served and to participate effectively in planning, operating, and evaluating the project, that council is probably large enough. It is probably not too large unless it has so many members that they cannot communicate and work together easily. Local school districts and advisory councils will be able to judge through experience how many council members they need and set their own guidelines accordingly. (PARENT INVOLVEMENT IN COMPENSATORY EDUCATION PROJECTS, Michigan Department of Education, p.4)

4.5.2 Eligibility to Vote in a DAC Election (Sec.125(a)(1), 116a.153,
H.Rept. 96-338, p.7)

Like the SACs, DACs may include as members individuals who are not eligible to vote in DAC elections. Only parents of children in project areas, including parents of children attending non-public schools and parents of preschool children if the LEA operates a title I preschool program and parents of children actually attending project schools, may participate in the election of the title I parent majority and any additional members to the DAC. Only parents of children in eligible areas and schools that are not participating in the title I program may vote for their DAC representatives. Non-parents and non-resident teachers may not vote in the DAC election. Parents of children in ineligible areas also may not vote in the DAC election.

4.5.3 Nominations for DACs (116a.154(b))

It is important to identify which candidates are parents of participating children before the DAC election to insure that a parent majority is elected. (See section 4.6.0 on Identification of Parents). Title I ESEA regulations require that those persons electing members of the DAC receive a list of candidates identifying each candidate as a parent of a title I child, a teacher in a project school, a teacher in a school serving a project area or a resident of the school district who is not a parent of a title I child or a teacher in a project school or a school serving a project area.

4.5.4 How to Attract Members

Look at section 4.4.5 on How to Attract SAC Members. The same advice applies here. The main difference is that potential DAC members should be aware that they will be responsible for advising the LEA on the overall operation of all title I projects in the school district not just one project in one school.

4.5.5 Election Procedures for DACs (Sec. 125(a)(1))

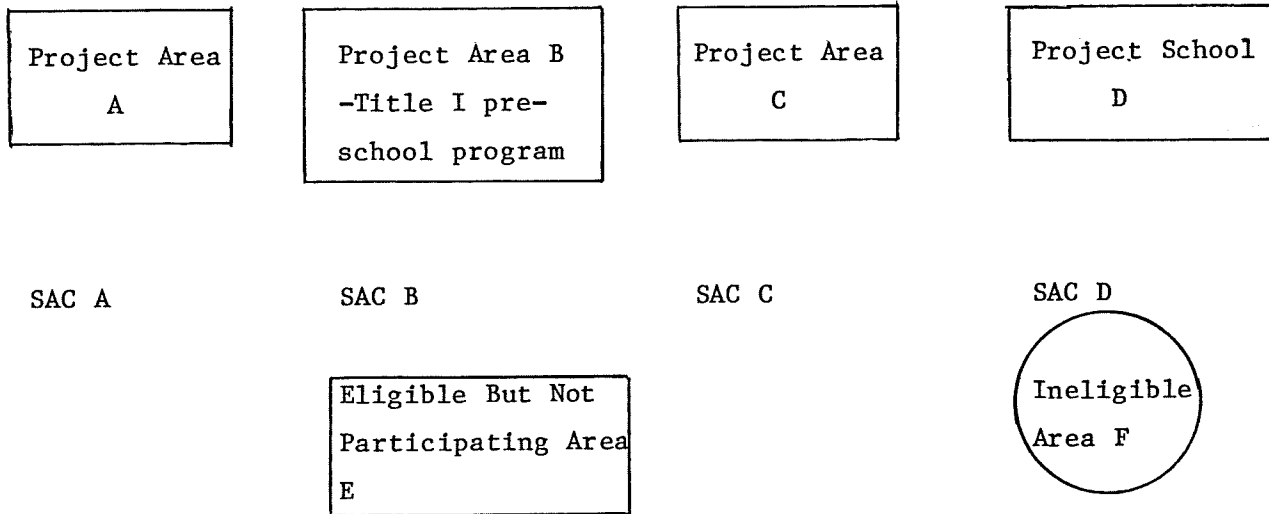
The LEA, in consultation with its DAC must adopt election procedures for the next year's (or term's) DAC. The election procedures must be designed to insure that the DAC meets the membership requirements discussed in section 4.5.1. The election procedures also cannot create categories of memberships which are not described in the law. The LEA does not have the option of

appointing DAC members. (Sec. 125(a)(1), 116a.153, 158)

Basically, the parents of title I children who will make up the majority of the DAC and any additional members are to be elected either by parents of school-age children in all the title I project areas and schools within the district or by all the SAC members in the district. The representatives of eligible but unserved children and schools are to be elected by parents of school-age children in the areas and schools eligible but unserved by title I. The adopted procedures must not preclude any resident in the school district from being elected to the DAC.

There are six basic options for DAC elections; three for election by parents and three for election by SACs. The following examples explain the available options. The examples do not go into specific election procedures such as balloting or voice vote. Instead the examples describe how parents or SAC members can be organized to elect DAC members. (Sec. 125(a)(1), 116a.153, H. Rept. 96-338, p.7)

For each example assume the LEA wants a 10- person DAC and has six attendance areas as follows:



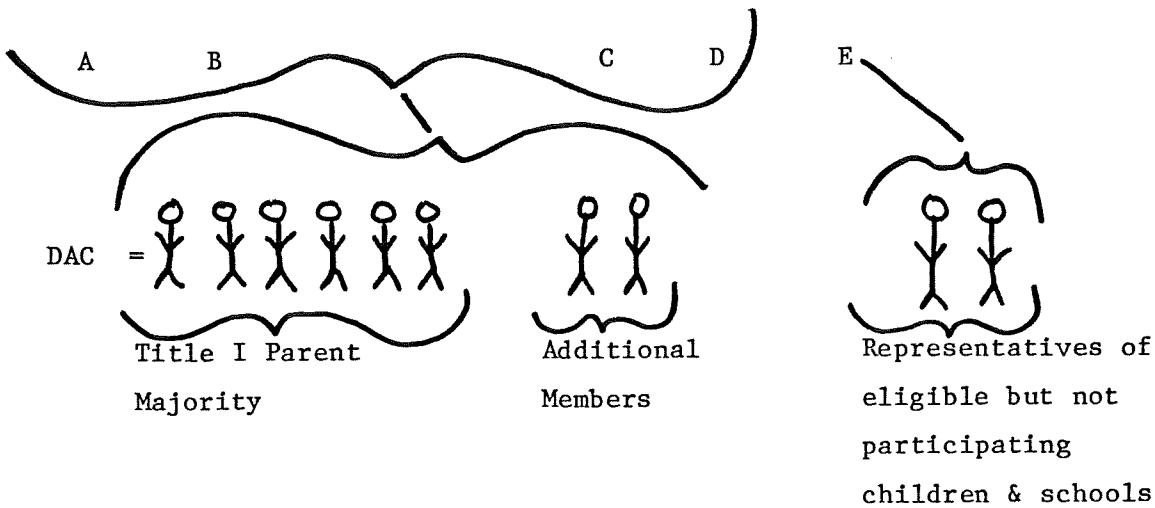
The elections options are:

1. All the parents who live in project areas A, B and C plus all the parents of children actually attending project school D vote for 8 DAC members, at least 6 of whom must be title I parents. Parents who live in project areas A, B and C whose children attend private school may also vote in the DAC election. Since

project area B operates a title I preschool program, parents of preschoolers in project areas A, B, and C may also vote.

Parents in area E vote for at least 2 representatives.

Parents in ineligible area F cannot vote at all.

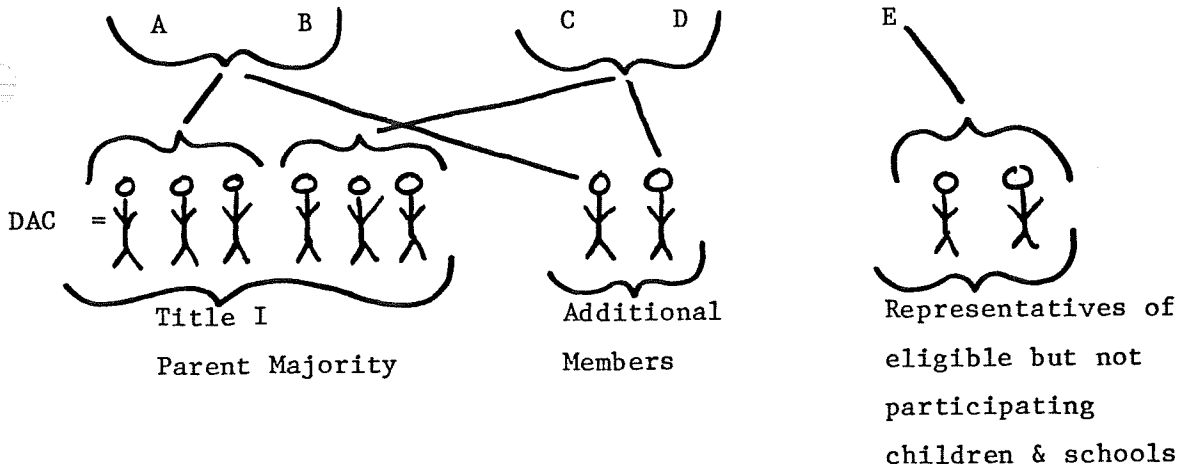


2. "One or more of the parent majority members and additional members are elected by parents in each group of project area and schools as designated by the LEA."

Under this alternative the LEA might want to group project area A and B together and project area C and project school D together. Parents of school-age children in project areas A and B will elect 4 DAC members; at least 3 must be title I parents. Parents of school-age children in project area C and parents of children who actually attend project school D will elect 4 DAC members; at least 3 must be title I parents. Parents of private school children in all three project areas will be allowed to vote in the appropriate election. Parents of preschoolers in project areas A, B, and C will be allowed to vote.

Parents in area E vote for at least 2 representatives.

Parents in ineligible area F cannot vote.

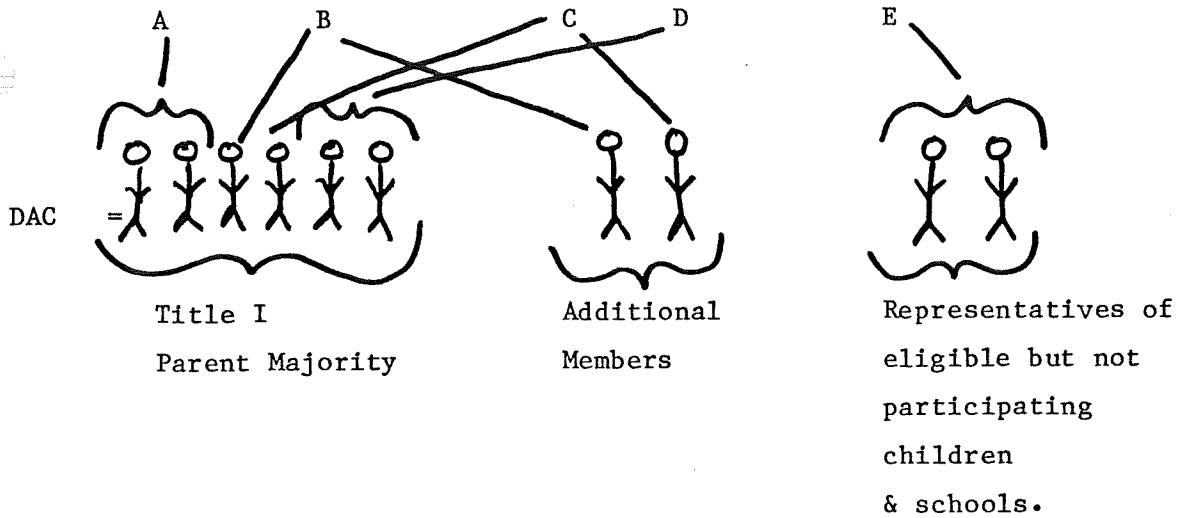


3. "One or more of the title I parent majority and additional members are elected by parents in each project area and school."

Under this alternative the LEA may organize its election so that a specified number of members are elected from a list of candidates for each project area and project school. For example parents in Project A will elect 2 title I parents. Parents in Project Area B will elect 2 DAC members; at least one must be a title I parent. Parents in Project Area C will elect 2 DAC members; at least one must be a title I parent. Parents of children actually attending Project School D will elect 2 title I parents. As in the other examples, parents of private school children and preschool children will participate where appropriate.

Parents in area E vote for at least 2 representatives.

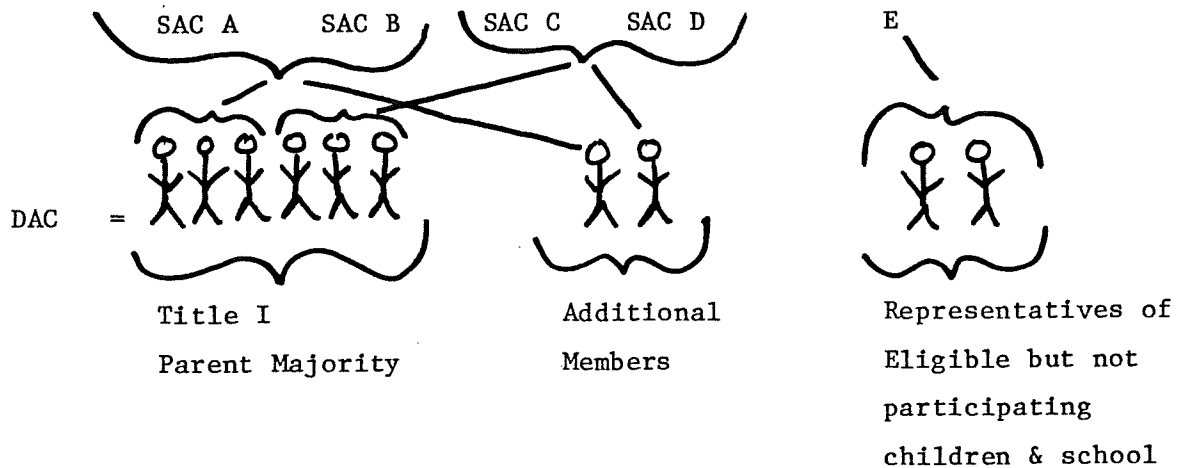
Parents in ineligible area F cannot vote.



4. "All the members of the SACs in the LEAs elect all of the parent majority and other members except the representatives of eligible but not participating children and schools."

Members of SAC's A, B, C and D elect 8 members; at least 6 must be title I parents. They may choose from among their own membership, allowing a "pyramid" structure.

Parents in area E vote for at least 2 representatives.
Parents in ineligible area F cannot vote.

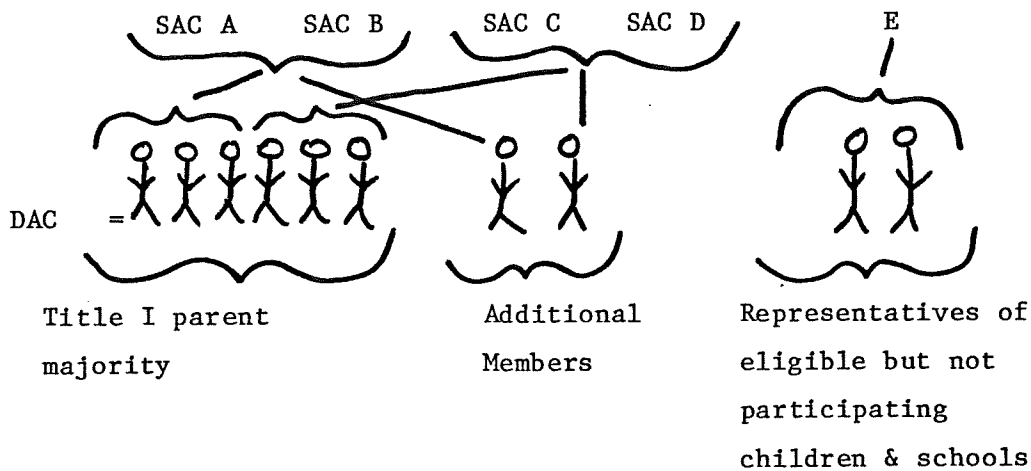


5. "The members of SACs for each group of project areas or project schools, as designated by the LEA, elect a specified number of members of the DAC."

The LEA may have designated that SAC A and SAC B elect 4 members; at least 3 must be title I parents; and that SAC C and SAC D elect 4 members; at least 3 must be title I parents. The SACs may elect their own members to be DAC members.

Parents in area E vote for at least 2 representatives.

Parents in ineligible area F cannot vote.

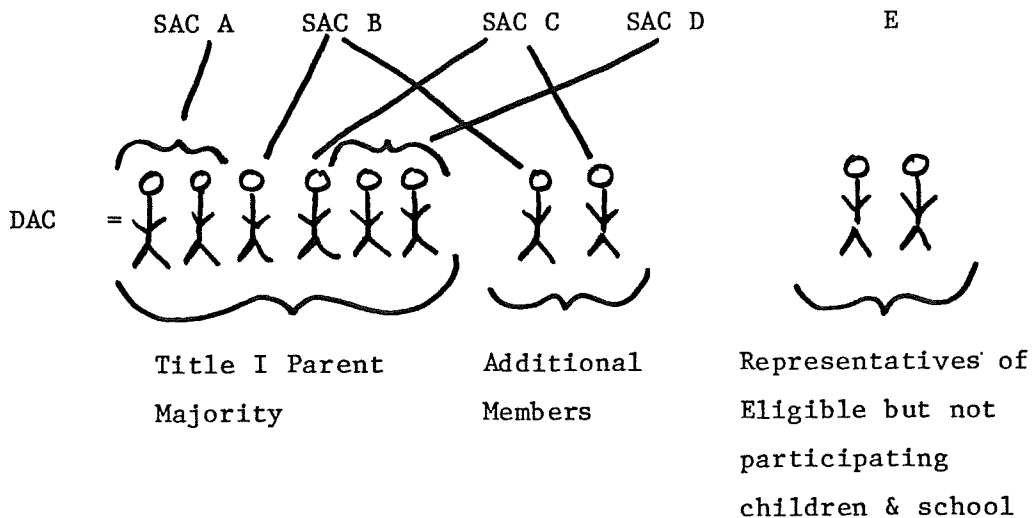


6. "The SAC for each project area or school elect one or more members of the DAC, as designated by the LEA."

SAC A will elect 2 title I parents; SAC B will elect 2 DAC members; at least one must be a title I parent. SAC C will elect 2 DAC members; at least one must be a title I parent. SAC D will elect 2 title I parents. The SACs may elect their own members to be DAC members.

Parents in area E vote for at least 2 representatives.

Parents in ineligible area F cannot vote.



The option chosen should be the one that insures that a majority of the DAC members are parents of title I children and that adequate representation be given to parents of children in eligible but unserved areas. Additionally, the LEA may not adopt procedures other than those required by law or regulation that would restrict the rights of parents to elect the persons they want to be members of the DAC (116a.154(c), 158).

4.6.0 Identification of Parents of Title I Children (116a.154(b), 99.30)

The public has the right to know which candidates for membership on an advisory council are parents of title I children so that it can verify that the advisory council will meet the parent majority requirement. Consequently, the LEA must establish appropriate procedures to identify parents of title I children so that they may be considered for advisory council membership. Parents may only be identified for this purpose with their written consent. In compliance with those requirements, the LEA should follow these steps:

(1) As school officials in pursuit of "legitimate educational interests" may have access to student data without the prior consent of parents, those officials may determine who are the parents of children currently being served or who will be served in the next project year (99.31).

(2) This information about a particular parent may not be disclosed for title I purposes without his or her consent. The written consent signed by a parent

must identify the records to be disclosed, the purpose of that disclosure, and the person or persons (by group or category) to whom that information will be disclosed. (34 99.30)

Model Procedures/Ways to Obtain Written Consent

- Schools could distribute consent notices individually to parents of students receiving title I services, asking them for permission to release their names if they want to be considered for membership on the advisory council.

- LEAs could send or mail a notice to all parents in a title I project school attendance area. This notice could announce that parents whose children are actually participating or will be participating in title I and who want to be considered for advisory council membership should identify themselves by sending in a written consent or by attending a special meeting during which parents may sign the consent form.

- Members of existing councils may canvass all parents in their respective attendance areas and request that those who are interested in membership in the council sign the written consent forms.

- Eligible title I parents could be invited by school officials to a meeting about the program, and then asked to give their written consent to be considered for membership on advisory councils.

- Teachers of title I students could explain the purposes of advisory councils and the requirements for written consent during parent-teacher visits or at other conference sessions.

- Local radio or television stations that broadcast information about community events could be requested to read a copy of a public service announcement about the advisory council election process which is to be undertaken, and the need to obtain written consent.

- Local newspapers can be asked to run stories about the program and the need for written consent from persons who wish to be considered as parents of

children eligible to be served.

4.7.0 Notice of Nominations and Elections

After identifying the parents of title I children, the LEA must establish procedures for the nomination and election of advisory council members. Such procedures must include appropriate and timely notice to parents and the general public of the time, place and method of nomination and election of advisory council members. In areas where the dominant language is not English, the notice must be given in the language that is spoken in the area. (116a.154)

There have been no formal guidelines issued to help LEAs determine what will be considered timely notice. Informally a common sense standard should rule. Basically, LEAs should plan for enough time between nominations and elections to allow parents to learn something about the candidates. The notice of nominations or elections should be informative including the date, time, method and place of election. It should clearly spell out the purpose of the nominations or elections. (116a.157(a)(2))

Availability of Names of Advisory Council Members

LEAs must make available to the public, through appropriate notices, the names of all members of its SACs and DAC and must continue to make these names available upon request. The LEA may also have to make the addresses of advisory council members available upon request. A request by mail is an appropriate way to ask for this information. (116a.157(d))

4.8.0 Responsibilities and Functions of Advisory Councils

Advisory councils are responsible for advising the LEA in planning, operating and evaluating title I programs and projects. In submitting its title I application to the SEA, an LEA must demonstrate that it has properly involved its advisory councils by showing that: (Sec. 125(b), 116a.159)

(a) Each SAC and DAC and each member upon request, has been given free of charge copies of the title I text, the federal title I regulations and guidelines, and state title I regulations and guidelines. (See sec. 4.9.0 on Advisory Council Access to Information.) (Sec. 125(c), 116a.160)

(b) All advisory council members will receive appropriate training, which has been planned in full consultation with members of the advisory council. (See

section 4.10.0 Training Programs for Advisory Council Members; see also section 3.4.1 of Chapter 3 on Staffing/Training.) (Sec. 125(d), 116a.161)

(c) The LEA is providing each SAC and DAC with the LEA's current application and other information and documents that the advisory council may need for its effective involvement in planning, operating, and evaluating title I projects. (See section 4.9.0 Advisory Council Access to Information). (H. Rept.95-1137, p. 28)

(d) Each advisory council has adequate opportunities to consider available information concerning the education needs of title I children in their district, area, or school and the various programs available to meet these needs. (See Chapter 2 on Selecting Program Participants.) In addition to getting information from the LEA, SACs and DACs may also want to conduct some type of evaluation activity of the title I program for the purpose of gathering data on which to base their recommendations. (Sec. 125(b), 124(b))

Model Procedures/Advisory Council Involvement in Needs Assessment:

In the late fall, one advisory council spent one meeting discussing the district's needs assessment with project staff. The staff reviewed information from the previous years and described the current and future plans for identifying student needs. A spring meeting concentrated on discussion and analysis of data which had been gathered. At the end of the second meeting interested parents formed a task force to expand the advisory councils role in planning and conducting the following year's needs assessment.

For several years, School District "A" had good math students. But as the years went by, the good math students graduated and the math program began to experience problems. For some reason, students weren't doing well. Teachers complained and parents were getting upset. The most serious problem seemed to be in the 7th, 8th & 9th grades. How did the district find out about its troubles? - by "running a needs assessment." Teachers filled out a survey, parents were asked questions, and all children in the school district were given a standardized test. The result confirmed that math achievement was poor in the middle grades. In an attempt to improve student performance the district decided to start a title I math program in two of the three eligible school buildings. ("Title I 'An Opportunity for Growth,'" State of Washington, p. 23)

Model Procedures/Advisory Council Involvement in Program Design:

• The title I director for District "B", finds his school district has been allocated \$10,000 more than it received last year. The director's first thought is, "We ought to be able to expand our program this year and hire that math teacher we need." For several years the title I program in District B had offered only reading. The director was always aware of the amount of money and resources that he had available to run a program. He knew that trying to serve too many children might "spread the program too thin," and end up jeopardizing the education of children served. After doing his homework, he asked the advisory council members for their opinion. It turns out that the parents are pleased with the news about the increase in money and after asking several questions, agreed to accept the director's idea of hiring a new math teacher to serve students with title I funds who need help in math. ("Title I 'An Opportunity for Growth'" State of Washington, p. 27)

• District "C" also received an increase in its title I budget, however, District "C's" title I director has a different set of decisions to make. With salaries and the cost of books going up, the director finds that it is necessary to use the funds to replace old title I equipment, to buy new supplies, and to increase salaries for staff. Once having made the difficult decision about what to do with the money, the director presents his ideas to the advisory council for its advice and recommendations. The director laid all the cards on the table and informed the parents about the situation. The advisory council thoroughly weighed the decision. The members asked questions such as the following:

- How much of an increase in money did we get?
- How much will it take to run the title I program next year?
- Will there be cut backs on any of the programs?
- Is it necessary to run the title I program at its current level?
- Will the number of participating children have to be reduced?
- Is there any district money to help support and expand the title I program?

These and other questions helped the members of the advisory council arrive at a recommendation and help the director make the final decision to keep the program at its current level and not to cut back or expand. ("Title I 'An Opportunity for Growth'" State of Washington, pp. 28 & 51)

Model Procedure/Advisory council involvement in selection
of project areas and schools

● There has been a title I reading program in half of the elementary schools in one school district for a number of years. The population in the area has remained relatively stable since the program began. The advisory council and other title I parents are satisfied with the reading program and see little reason to change it. When the application for project renewal is prepared each spring, the title I director reviews the procedures by which eligible areas and schools are identified and determines that the project areas are still eligible. The advisory council reviews and agrees with the district decision to continue title I project services in the same schools. ("The Parent Advisory Council Handbook" Florida Department of Education, p. 44)

Model Procedure/Guidelines for Advisory Council Members

These are tips for advisory council members from the State of Washington that can help members to advise the district or school:

1. Members should ask the title I director to describe fully the title I program for the entire school district. This allows members to compare other title I projects with their own.
2. Members should ask for all necessary information such as the title I application that will help to describe the title I program.
3. Members should ask for information relating to evaluation procedures concerning the title I program.

4. Members should always ask for definitions of education terms if they are not understandable.
 5. Members should ask for reports that will show how much money has been spent so far in the program and how much is left to spend. This might help members to understand the necessity for effective budget planning.
 6. Members should try to compare previous efforts with new programs to determine if progress is being made.
 7. Members should remember that their role as council members is to provide advice and information to the title I director. The ultimate decisions are up to the title I director and staff and the district administration. ("Title I 'An Opportunity for Growth'," State of Washington, p. 51)
- e) Each advisory council has adequate opportunities to make recommendations concerning which needs the title I project should meet and which should be met by other programs. (Sec. 125(b), 124(f), 427(1) GEPA)

Model Procedures/Advisory Councils Recommending
Needs be Met by Other Programs

● Educational needs: Ample information was available in the school district to determine the eligibility of schools. But the question remained: Which of them should be selected as target schools? A DAC subcommittee was formed to examine needs assessment data and to determine what other special programs existed in the eligible areas. Of the eight eligible areas, three had few children who required extra help. The committee found that on two of the remaining schools, the majority of educationally deprived children already received added help from ESAA and Migrant programs. Therefore, the committee strongly recommended that the title I project be concentrated in the remaining three schools, where children had substantial needs that were not being served by any other program. ("The Parent Advisory Council Handbook" Florida Department of Education, p. 44)

- Nutritional needs: In one school district a parent suggested to the SAC

that a breakfast program be started because of the link between good nutrition and learning. Three council members surveyed a 4-block area near school and found that 160 children were going to school without breakfast. The breakfast program is fully Federally funded. All title I schools have the program. Title I teachers have told council members that the children were more attentive as a result of eating breakfast. (Children's Foundation)

- Nutritional needs: In an urban elementary school it was the principal who first presented the idea of having a school breakfast program to the SAC. The SAC members initially decided against the program. As the local economic situation grew worse, however, the SAC decided that the program was needed. The breakfast program is fully Federally funded but 2 or 3 parents of title I students help out with the breakfast program on a regular basis. The principal feels that the breakfast program is responsible for increased parental involvement in title I activities and increased student attendance from the previous year when the program was not offered. (Children's Foundation)

- (f) Each advisory council makes opportunities for parents of title I children in their project area, project school, or district to present their views on the LEA's title I application. (Sec. 124(j), 125(b), GEPA 427(2))
- (g) Each advisory council has opportunities to submit comments on the title I program, projects and application and that the LEA has considered the advisory council's comments before it approves an application and submits it to the SEA; (Sec. 125(b)), GEPA 427)

Example/Effect of an advisory council sign-off

There is no Federal requirement for advisory councils to sign-off on title I applications. Some SEAs, however, do require the council to sign off before they will consider an LEA's title I application. Many SEAs just look to see that the parent portion of the application is filled out. Every SEA has its own method for meeting the requirement that advisory councils be allowed to comment on title I applications and have their comments considered by the LEA.

● The advisory councils should have an active role in the pre-submission process. The LEA should provide the SACs and DACs with a copy of the pre-submission application allowing ample time for the SACs and DACs to study its contents, make recommendations and for the LEA to consider incorporating these recommendations into the pre-submission application.

(h) Each advisory council has met regularly throughout the year and that each advisory council operates under procedures that allow it to effectively carry out its responsibilities. (H. Rept. 95-1753, p. 258)

Model Procedures/How to Run a Meeting

● Most PACs use Roberts Rules of Parliamentary Procedures to conduct their meetings.

● A meeting may be organized in the following manner:

- 1) Chairman: "The meeting will come to order. The secretary will read the minutes of the last meeting.
- 2) Secretary: (Reads minutes)
- 3) Chairman: "Are there any corrections to the minutes?" (Secretary records corrections, if any.) "The minutes are approved as read (or corrected)."
- 4) Chairman: "We will now have a report of the committee."
- 5) Committee Chairman reports. Chairman of the council then calls for other committees to report, if any more.
- 6) Chairman: "The secretary will read the correspondence."
- 7) Secretary: (Reads mail received since last meeting.)
- 8) Chairman: "We will now take up old business as listed on your agenda. The chair opens discus-

sion on agenda item number ____."

- 9) Following completion of old business, the chairman asks: "Is there any new business?"
- 10) Following the completion of new business, the meeting is adjourned upon motion made and seconded. ("The Parent Advisory Council Handbook," Maryland State Department of Education)

- Most states suggest that advisory councils meet at least once a month. (H. Rept. 95-1137, p. 28)

- (i) Advisory council members should also get involved with project evaluations. The basic questions asked by a project evaluation are: Is title I helping children do better in school? If so, by how much? Evaluations must be done yearly of how well the title I project met the identified educational needs of the students who participated. Evaluation reports are one resource for advisory councils when they participate in the needs assessment process. SACs and DACs may also want to do self-evaluations from time to time to make sure that their activities are effective and remain effective. (Sec. 125(b), 124(g))

Model Procedures/Advisory Council Involvement in Evaluations

- Evaluation was the topic of several monthly meetings of one DAC. The project director described the previous year's evaluation and outlined the proposed procedure for the present and following year's projects. In addition, a part of each meeting was devoted to a discussion of ways the advisory council might get more involved in title I evaluation. ("The Parent Advisory Council Handbook", Florida Department of Education, p. 50)

- A second DAC established a project evaluation committee. In the fall, the committee members read the previous years report, reviewed it with the title I director and staff and discussed student achievement at a general DAC meeting. They then reviewed the current year's plan and worked with the staff

on an approach for the following year. At the February meeting, the committee summarized the pre-test results and reported on the progress of the ongoing evaluation. They also submitted an outline of the evaluation plan, developed with district staff, to be included in the title I proposal for the following year. ("The Parent Advisory Council Handbook," Florida Department of Education, p.50)

- A project evaluation committee also was formed by another DAC and directed to find out if evaluation results in previous years had led to any changes in project activities. Committee members reviewed past reports and project applications and found that, in fact, there had been no direct connection between evaluation and project design. The committee and project staff jointly recommended that the committee work with the DAC's project design committee and district personnel to prepare the following year's application.

The committee members also visited title I classrooms and observed the way ongoing student progress was kept track of. They then worked with the district staff to change the way teachers and aides recorded day-to-day student activity and progress. ("The Parent Advisory Council Handbook," Florida Department of Education, p. 50)

(j) Monitoring the title I project is another area for advisory council involvement. Monitoring is meant to answer questions like "Is the project doing what it set out to do?", and "Does it satisfy Federal and State regulations?" Monitoring is a systematic review of title I project activities. Its purpose is to spot present or potential problems in order that they be corrected. (Sec. 125(b))

Model Procedures/Advisory Council Involvement in Monitoring

- A small committee was organized by a DAC to review State monitoring reports and determine if changes in the project were necessary. The committee went over the latest report with the project director and found that only minor problems had been noted and that all had been corrected. The committee reported this back to the DAC with no suggestions for change. During the next State monitoring visit, representatives from each council accompanied the monitor while he was at their school. The monitor discussed his findings and

recommendations with staff and parents at a special district-wide advisory council meeting. ("A Handbook for Parent Advisory Councils", State of Washington, p. 10.3)

- Another DAC formed a project monitoring committee, which decided to monitor each title I building once during the year, using the State checklist. A schedule was set for the year, according to which committee members would check key stages of the project. The committee monitored student selection in October, and with needs assessment and project design in March and April. The committee interviewed title I staff, visited classrooms and studied major project reports. Copies of the completed checklists were given to each SAC, with requests for written reactions. Copies also were given to the title I director, who reviewed the findings with the DAC and outlined the action to be taken to correct the problems noted. ("A Handbook for Parent Advisory Councils", State of Washington, p. 10.3)

- In this district, task forces formed by each SAC were given the job of monitoring each school's project in December and April. Using the State checklist, task force monitors interviewed title I staff and studied all project records. Where problems were noted, the task forces and the project director decided how to correct them and set up an action schedule.

The monitor found that there was no uniform, district-wide procedure to screen and select students. Accordingly, the DAC project design task force was asked to work with the staff and set up such a procedure for the following year. ("A Handbook for Parent Advisory Councils," State of Washington, p. 10.3)

- State or Federal monitors may also want to consult with SAC members when they visit the title I project. These monitors will most probably be interested in knowing in what activities the PAC has been involved. ("A Handbook for Parent Advisory Councils," State of Washington, p. 10.3)

When Advisory Councils Must Give Their Consent

Advisory councils generally act in an advisory role. There are, however, a few situations where advisory councils must give their consent before the LEA can act. An LEA must get the consent of the DAC before it can rank schools

according to educational rather than economic criteria in determining which eligible areas and schools will become project areas and schools. (Sec. 122(a)(2)(B)) (See Chapter 1 on Designating School Attendance Areas) An LEA must get the consent of the project area SAC before it can designate a school serving the attendance area for a school-wide project. (Sec. 133(b)(4)) (See Chapter 1 on "Designating School Attendance Areas.") Additionally, the advisory council members should be aware of their role in the complaint process, as advisor to a parent making a complaint, and as an overseer of the complaint process. (See section 4.14.0 on Complaint Resolution Process.) (116a.159(b)(c), 181)

4.9.0 Advisory Council Access To Information

Each LEA shall provide without charge to each advisory council and upon request to each advisory council member:

- (a) a copy of the title I text;
- (b) a copy of all appropriate federal regulations and guidelines;
- (c) a copy of appropriate state regulations and guidelines; and
- d) a copy of this policy manual. (Sec. 125(c)(1), 187(a), 116a.160(a), H. Rept. 95-1753, p. 265)

Each LEA should also provide each advisory council with the LEA's current application and documents such as prior applications and evaluations, that the advisory council may need for its effective involvement in planning, operating and evaluating title I projects. (H. Rept. 95-1137, p. 28)

Each SEA shall provide to the DAC a copy of any report resulting from:

- (a) State or Federal auditing activities;
- (b) State or Federal monitoring activities; and
- (c) State or Federal evaluating activities that take place in the DAC's district. (Sec. 125(c)(2), 116a.160(b))

These materials are useful tools for advisory council members only if the advisory council members understand of what they are and how to use them. If advisory council members do not understand a law or regulation or part of the

application they should ask the title I ESEA director or other staff members to explain it to them. These materials are not meant to be advisory council members' sole link with the title I program. They are meant to be the stepping stones to a more meaningful involvement.

4.10.0 Training Programs for Advisory Council Members

Each LEA is responsible for developing a program to provide its advisory councils with appropriate training that will enable the council members to carry out their responsibilities of advising the LEA in planning, operating and evaluating its title I programs. Training must be directly related to the title I services to be provided during the school year in which the training is being provided or be related to the title I services that will be provided in the next school year. Training must also be necessary to meet the needs of the participating children. The required training should improve the understanding of: (a) the needs of educationally deprived children in the school district, (b) how title I requirements apply to the programs on which the SACs and DACs must advise the LEA, and (c) the current title I activities being conducted by the LEA and how they relate to the regular school program. The LEA must consult SAC and DAC members in planning a training program. (Sec. 125(d), CFR 116a.161(a), 75(b))

"Since one of the primary goals of parent involvement is a closer working relationship between parents and educators, planners should involve teachers and district staff members in some of the training sessions. This will give council members an opportunity to meet some of the officials they will be working with and also provide for an exchange of ideas. Although outside consultants may be needed, the LEA should make use of all local resources, including teachers, school board members, target areas parents already involved in the school program, and other community members." ("Parental Involvement in Title I ESEA" (1972))

Training should be a continuing process. The state of Washington has recommended the "zeroing-in-method" to its SACs and DACs as the best way to identify specific council training needs. The "zeroing-in-method" goes something like this:

*Form a committee of two or three council members.

*Ask members of the councils in the district what they feel the training needs of parents are. For example, a council cannot review and make recommendations for a new remedial reading program if the members do not understand the individualized instruction or programmed materials techniques that may be used.

*Review these training needs with members of the DAC.

*Once an agreement is reached about what the needs are, then start to plan the training program.

*Determine the financial resources.

*Determine the human and material resources (Will presenters be needed or will most of the training be geared to audio visual materials such as films, slides, etc.)

*Design the training program based on the needs assessment. Don't stray away.

*Use the local resources first before asking for outside presenters. Often the teaching staff, for example, is well prepared to make a presentation of the use of tape recorders in the classroom.

*Always work with the title I staff. .ask questions and seek their advice.
("Title I 'An Opportunity for Growth'" State of Washington, p. 55)

Once the specific council training needs have been identified, group training to meet these needs can be offered in the following ways:

*County or city-wide council meetings give parents an opportunity to work with the council staff in making yearly plans.

*Staff meetings provide a regular time and place for training as part of an overall presentation.

*Retreats provide a relaxed atmosphere for the discussion of title I materials and foster feelings of mutual respect and understanding among members.

*Informal get-togethers, eating lunch together, or meeting informally for a picnic or a weekend get-together, can also be a highly effective occasion for in-service training. The more the members know each other and communicate and relate to one another, the more fully the goals of the program will be met.

*Visits to title I in other schools to observe the use of equipment, to observe teaching techniques, and to talk about the title I program with students, teachers, and administrators so they can channel expressed concerns to the proper authorities. ("Parent Advisory Council Handbook", Maryland Department of Education)

The following are examples of how some councils have approached training.

- A group of DACs in neighboring districts held a joint training program for members and district personnel. The program consisted of (1) a basic orientation workshop in October and (2) a January workshop focusing on needs assessment and project design. This enabled each DAC to more actively participate in planning the following year's project. Title I project directors from the participating districts conducted the sessions. ("The Parent Advisory Council Handbook", Florida Department of Education)

- Another council arranged for a series of six training sessions, to be held as a part of their regularly scheduled monthly meetings. The topics included basic title I regulations, organizational structure, target school selection, project monitoring, project design and evaluation. Ran the sessions resource personnel from the intermediate school district assisted by the DAC chairperson and the title I director. ("The Parent Advisory Council Handbook", Florida Department of Education)

● A third DAC held three half-day workshops during the school year on 1) basic orientation and DAC organization, 2) needs assessment and project design and 3) project monitoring and evaluation. The title I project director and DAC chairperson conducted the orientation session, while consultants were hired for the latter two workshops.

4.10.1 Description of Training Program in LEA Application (Sec.125(d))

An LEA must demonstrate in its application for title I ESEA funds that the SACs and DACs have been given opportunities to take full advantage of their advisory role. Each title I application must describe a training program that will help council members to meet their responsibilities. The applications must show that the training programs are planned in full consultation with the council members and that they provide each member of each council with appropriate training materials. Appropriate training materials include all the documents described in 4.9.0. All other materials that are used for training should be readily understandable and be devoted to title I requirements. (Sec. 125(d), 116a.161(a))

An LEA should also include in the application the following information about the SAC and DAC training program:

- (1) A description of the training that is planned;
- (2) The number of council members involved;
- (3) The approximate amount of SEA funds required for training activities;
- (4) A justification that the costs of training are reasonable and necessary to carry out the functions of the advisory councils.

Title I funds may be used to cover the expenses of training including expenses associated with attendance of council members at the training sessions. Whether or not the LEA decides to spend title I funds for SAC and DAC training, the LEA must provide training to the council members. (Sec. 125(d)(3), 116a.161(a)(3), 75)

4.10.2 Training that Involves Travel

The title I law and regulations emphasize that training should be provided at the local level whenever possible. Both the law and regulations recognize, however, that it may be useful for council members to meet with members of other councils. Accordingly, the regulations allow several LEAs receiving title I assistance to provide training together outside their communities when it is cost effective to do so. (116a.161(b), H. Rept. 95-1753, p. 258-259)

Regional and national conferences are treated differently than combined training sessions for two or three councils from different LEAs. Regional and national conferences can only be included as part of an advisory council's training program if 1) the Secretary of Education determines in advance that attendance at the conference will provide unique and valuable experiences and 2) the SEA determines in advance that the conference is relevant to the LEA's project and to the functions of each council member who will attend the conference. Additionally, the LEA must limit the number of council members attending a regional or national conference at title I expense to that number which will insure that the information and training received will be made available to other council members. Currently, the Secretary of Education makes determinations on a case-by-case basis, based on: (116a.161(c))

- (1) Relevance of agenda to title I;
- (2) Uniqueness of the subject matter;
- (3) Timing of conference in respect to key events affecting title I programs; and
- (4) Specific advantages of holding a national or regional conference.

To date the requests for the use of title I funds for out-of-State travel have related to meetings of the National and Regional Coalitions of title I Parents, PUSH, and USOE workshops. The Secretary reviews the agendas to insure that the meetings are devoted to training parents. Present policy is to allow the use of title I money for only one National Coalition meeting per year and only one Regional Coalition meeting per region per year. The requests denied so far have been requests to travel to second regional conferences. The USOE has

offered to provide guidance to SEAs and LEAs for determining the appropriate numbers of council members whose attendance at regional and national conferences may be paid out of title I funds. In the meantime, the Department has advised SEA:

- (1) to develop plans to determine how delegates to out-of-State conferences will be divided among LEAs;
- (2) to develop plans to have delegates to out-of-State conferences train other council members who cannot attend; and
- (3) to apply these same standards to State conferences.

4.11.0 Which Advisory Council Activities Can Be Paid For By Title I

A question title I directors often ask themselves when helping their SACs and DAC plan activities is "Will title I cover the cost of this activity or am I going to have to look to other funds to pay for it?" The "other funds" could be either state or local funds or even the council members' own pockets! The director should ask himself a few more questions and ask the council members for their advice before he decides how to pay for the advisory council activity.

First the director should ask "Will this activity help the council to carry out its responsibilities?" If the answer is yes he should then ask, "Is the cost of this activity reasonable and is the activity necessary for the DAC or SAC to function properly?" If he can answer yes to this question, he should finally ask, "Can the LEA authorize payment of title I funds for the costs of this type of activity?" and "Is this activity within the scope of those activities described in the LEA's approved title I application?" If the answers are again yes then title I can pick up the cost. (74 Appendix C)

Title I funds may be used to cover the expense of training, including expenses associated with the attendance of council members at the training sessions so long as the sessions are within the scope of the LEA's approved application. Such training should help the participants act more effectively as members of their particular council and should be provided at reasonable cost. The types of expenses that could be covered include registration fees and the actual cost of travel to the session. Title I funds will cover the expense of

out-of-State travel in special and unusual circumstances. (See section 4.10.2 or Training that Involves Travel) Title I ESEA funds may also be used to reimburse council members for personal expenses directly related to the performance of their Title I duties and functions. (Sec. 125(d)(3), 116a.161(a)(3), (c))

Other expenses that are currently allowed are: (116a.162(c))

- (1) babysitting
- (2) transportation
- (3) copying minutes
- (4) parking
- (5) mileage
- (6) meals
- (7) actual cost of travel (food, lodging and related expenses) by council members in connection with a title I activity that is within the scope of the LEA's approved application, and
- (8) Council elections, including printing costs and mailing expenses.

Expenses that are not allowed include:

- (1) salaries
- (2) payment for time lost at work
- (3) a per diem rate, and
- (4) individual memberships in any organization or group.

Before any expense related to a council activity can be paid or reimbursed it must be authorized in advance by the LEA and be within the scope of the LEA's approved title I project application. (116a.162(b))

A major problem in this area, especially where food is concerned, is determining whether the activity (for example, refreshments) is merely social or whether it is necessary to make the training session or council meeting effective. The cost of necessary activities may be paid out of title I funds, but not the cost of purely social activities. Council members and title I directors should seek additional guidance from their SEAs as to what are allowable costs.

4.12.0 Workshops on Parent Involvement

The Secretary of Education is required to sponsor annually regional workshops on parent involvement. The purpose of these workshops is to assist LEAs to work with and provide training to council members and to facilitate parent involvement in title I ESEA programs. The Secretary is to plan and conduct these workshops in consultation with members of councils in the region being served. If the affected LEAs and councils agree, private organizations may plan and conduct the workshop. (Sec. 125(e), 116a.161(d))

4.13.0 Involvement of Individual Parents

An SEA is required to reject an LEA's application for title I funds if all parents of title I children are not given opportunities to participate in the development of title I projects. The SEA must also reject the application if the parents are not informed of, or permitted to make recommendations concerning, the instructional goals of the title I project and the progress of their children in the title I program.

The LEA must give all parents of title I children opportunities to assist their children in achieving the goals of the title I project. These parents are entitled to receive, upon request, copies of the LEA's application and other pertinent documents. All parents of title I children must also have an opportunity to present their views on the title I program to the appropriate advisory council and these parents should be informed of the complaint process and encouraged to use it when necessary. The LEA should decide on specific means for involving parents. "No LEA should be required to use title I funds for this. However, distribution of materials to parents would remain one permissible means of fulfilling the requirement to involve parents individually, as is setting up school volunteer programs" (H.Rept. 95-1137, p. 25, Sec. 124(j)).

The following are examples of how individual parents can become involved in the education of their child and his/her title I program:

Involvement with own child:

- help create a positive attitude toward school and learning
- encourage a sense of responsibility and positive approach to challenges

- arrange for a place in the home to study and provide conducive conditions for study
- listen to the child read
- take time to talk with the child about the happenings at school and his/her reactions, feelings, worries, fears, etc.
- take an interest in material and papers that are brought home

Involvement with children at school

- help with handwriting exercises and review or drill types of work in mathematics, phonics, spelling, etc. using flash cards or other materials
- assist with creative writing activities, such as helping children write and illustrate their own books
- read stories to and with groups or individuals.

Involvement as parent liaison

- babysit for pre-school children while their parents visit the school
- act as interpreter for non-English speaking parents and to lessen cultural gaps in the community

Involvement at the school level

- monitor halls, doors, and playgrounds to maintain school security
- assist teacher on field trips
- supervise collection and distribution of clothing for needy children

Involvement at the classroom level

- prepare various remedial or supplementary materials for title I children
- make puppets for story tellings

4.14.0 Complaint Resolution Process

There are several methods for making sure that title I programs and projects are run according to the requirements set out in the law and regulations. The easiest method is the normal procedure of developing a title I program and applying for title I funds. The involvement of individual parents and advisory councils in the development and application process and the SEAs acceptance or denial of the application are safeguards against an LEA trying to use title I funds inappropriately. Other methods to insure the proper use of title I funds are SEA monitoring of its title I sites within the state and state and federal auditing of title I projects. (For discussion of these methods, see Chapter 7.4.5)

There is one important additional method that may directly involve parents. This is the complaint process. If parents, advisory councils, teachers, or other concerned individuals or organizations feel that there are violations of the title I requirements or the requirements of other laws that affect title I programs, they may submit complaints to the LEA, SEA or Secretary of Education. This section will explain what a complaint should contain, where a complaint should be submitted, and what happens after the complaint is made. The following example will be used for the rest of the chapter to show how the complaint process works (Sec. 128, 168, 184, 116.180, 181, 182).

DAC A has been properly elected and it meets once a month. The DAC members are upset, however, because they leave each meeting with a feeling that nothing has been accomplished. They feel that the title I staff talks to them but does not consider their opinions. The DAC members individually and collectively have approached the title I director and other title I staff informally to express their desire to be more involved in the title I project. No effort has been made to correct the situation. A frustrated DAC decides to file a complaint.

Where to File a Complaint

DAC A must decide where to file its complaint. A complaint can be filed with the LEA, the SEA or the Federal Department of Education (ED). The regulations emphasize that a complaint relating to a title I project operated by an LEA should be filed first with that LEA. This general rule should apply in almost every situation. DAC A should evaluate the nature of its complaint and decide if the circumstances surrounding its complaint make it necessary to by-

pass the LEA and go directly to the SEA of ED. (116.182)

If DAC A goes directly to the LEA it will have several opportunities to contest the LEA's decision if the decision is not agreeable to DAC A. The process of contesting the LEA's decision takes time, however. Some complaints require immediate action and the time needed to go directly to the LEA might prevent certain complaints from ever being effectively corrected. Consequently, DAC A must decide whether the time associated with going directly to the LEA will, in fact, prevent DAC A from ever effectively resolving its complaint. If the answer is yes and DAC A can show that the SEA or ED will most probably rule in its favor, it can by-pass the LEA and go directly to the SEA or ED. DAC A may also be able to go directly to the SEA or ED if it can show that the LEA knew of the alleged title I violation in DAC A's complaint and failed to correct it in sufficient time. (116.186(a), 242(a))

DAC A decides to file directly with the LEA. DAC A wants its complaint, that it is not being allowed to take an active advisory role in the title I program, resolved as quickly as possible. DAC A realizes, however, that the time associated with going directly to the LEA will not prevent its complaint from ever being resolved. Additionally, DAC A members have approached the LEA only informally. DAC A members are sorry that the informal approach did not work, but they feel it is more appropriate to approach the LEA formally through the complaint process than to go directly to the SEA or ED for their type of complaint. DAC A wants to give the LEA another chance to solve the problem.

Contents of the Complaint (116.180)

Now that DAC A has decided where to file the complaint, it must write the complaint. The complaint must contain:

- (1) A statement that the LEA has violated a title I requirement that is found in the Title I law, title I regulations, title I interpretive rules, GEPA or EDGAR;
- (2) Information that supports the stated violation,
- (3) A specific request that the violation be corrected; and,
- (4) Copies of documents that support the truth of the stated violation including relevant State and local laws, regulations, guidelines and correspondence.

Additionally, the complaint must be signed by the complaining party.

DAC A should state in its complaint that the LEA does not allow the DAC to actively advise it in the planning, operating and evaluating of the title I project in violation of Sec. 125(b) of the title I statute. DAC A should then state any information that supports its charge that they have no advisory responsibilities and DAC A should request that the LEA order the LEA's title I staff to take steps to involve the DAC in the title I project. DAC A must sign the complaint. DAC A can authorize its chairperson to sign the complaint on its behalf. Attached to the complaint should be any documents that support DAC A's charge, including a copy of the minutes showing that the chairperson was authorized to sign the complaint.

Complaint Resolution Process at the LEA Level (Sec. 128)

Once DAC A has written its complaint and filed it with the LEA it should review the LEA's written procedures for resolving complaints from SACs, DACs, parents and other concerned individuals or organizations. The title I law requires not only that these procedures be written and given to all SACs and DACs, but that certain specified steps be included in the LEA's procedures. (Sec. 128, 116.183)

For example, DAC A's LEA will only have 30 days to investigate and resolve DAC A's complaint. If the LEA wants more time to resolve the complaint it will have to get permission from the SEA. The SEA will require that the LEA show that "exceptional circumstances" exist that prevent the LEA from resolving the complaint within 30 days. Exceptional circumstances may include the necessity for an investigation or an audit to determine whether the statements in the complaint that a title I violation exists are true. The SEA may also want to consider the nature and complexity of the problem that is the basis for the complaint in determining whether exceptional circumstances exist. (Sec. 128(1), 116.183(b)(1), 184)

The LEA will also have to hold a hearing where DAC A can present evidence and question LEA officials. DAC A can hire an attorney or other advocate to represent its position at the LEA hearing. At the hearing DAC A will want to present documents like copies of minutes, that support its complaint that the DAC is not actively involved in the title I project. (Sec. 128(3), 116.183(b)(3), 185)

After reviewing the complaint, the evidence presented at the hearing and the questions and answers exchanged at the hearing the LEA must issue a written decision. If DAC A is dissatisfied with the resolution of the complaint it can appeal the resolution to the SEA. This means that if DAC A does not like the LEA decision, it can ask the SEA to review the LEA decision and determine whether the LEA resolved the complaint correctly. If DAC A does decide to appeal, its appeal must be postmarked within 30 days after DAC A receives the LEA's written decision. After the 30 days have passed the SEA will not be obliged to consider an appeal.

The LEA determines that DAC A has been actively involved in the planning operating, and evaluating of the LEA's title I project. DAC A is dissatisfied and decides to appeal this decision to the SEA.

Complaint Resolution Process at the SEA Level (Sec. 168)

DAC A will have to check its State's guidelines to see what kind of information the appeal must contain. Once DAC A has filed its appeal with the SEA it should look over the SEA's written procedures for reviewing appeals of LEA decisions. As with LEA procedures, the title I law requires that the SEA have written procedures for reviewing appeals and that these procedures be given to all SACs and DACs and other interested parties. The title I law also requires that certain steps be included in the SEA's procedures. (Sec. 168, 116.186)

The SEA will have 60 days to review DAC A's appeal and make a decision. The SEA may take more time if exceptional circumstances exist. In determining whether exceptional circumstances exist the SEA will consider the need for an investigation or an audit and the nature and complexity of the problem that is the basis of the appeal. (Sec. 168(1), 116.186(b)(1), 187)

The SEA will also have to hold a hearing where DAC A and the LEA can present evidence, question parties and question witnesses. DAC A may have an attorney or other advocate represent its interest at the SEA hearing. (Sec. 168(2), 116.186(c)(2))

After the SEA reviews the information contained in the appeal and the evidence and testimony given at the hearing it will have to make a decision. It's decision must include:

- (1) A summary of the facts according to DAC A that led up to DAC A filing the complaint;
- (2) The violation of title I that was stated to exist in the complaint;
- (3) The SEA's determination of what the facts surrounding the complaint are, including a summary of the evidence and testimony that the SEA considered when it made its determination;
- (4) The SEA's decision and the reasons for its decision, and
- (5) Any orders the SEA gave to the LEA to correct the problem contained in the complaint. (CFR 116.188)

After DAC A receives the SEA's written decision it will have to decide whether to live with the SEA decision or appeal it to the Assistant Secretary of Elementary and Secondary Education at ED. DAC A's appeal must be postmarked no later than 30 days after receiving the SEA's decision or it will lose its right to appeal. (Sec. 168(3), 116.186(b)(2), 243)

Appealing to the Assistant Secretary of Elementary
and Secondary Education

DAC A decides to appeal the SEA's decision. The SEA interprets the title I law to mean that monthly meetings meet the requirement of involving the DAC in planning, operating and evaluating the title I program. DAC A feels that monthly meetings alone are not enough to meet this requirement in the title I law. DAC A's request for an appeal to the Deputy Assistant Secretary of Elementary and Secondary Education must:

- 1) Be written and signed
- 2) Identify those parts of the SEA's final decision that DAC A disagrees with and indicate why DAC A disagrees; and
- 3) Indicate what DAC A would like the Assistant Secretary to do to resolve the complaint. (116.243(d))

DAC A sends its appeal to:

Assistant Secretary for
Elementary and Secondary
Education
400 Maryland Avenue, S.W.
(ROB 3, Rm. 3642)
Washington, D.C. 20202
Attention: Title I Complaint

When the Assistant Secretary receives DAC A's complaint, he will choose an ED official to consider DAC A's appeal. (116.243(c), 244(a))

Complaint Resolution Process of the Chosen Official (116.244, 245)

The chosen official has to first decide whether to accept or deny DAC A's request for an appeal. If the chosen official decides to deny DAC A's request, the chosen official must notify DAC A, the LEA and the SEA that the request for an appeal has not been accepted and the reasons why the appeal is unacceptable. If the chosen official decides to accept the appeal, DAC A, the LEA and the SEA will have 20 days from the date the notice of acceptance is postmarked to send the chosen official any additional evidence they want him to consider. The SEA will also be asked to submit a copy of its final decision and a copy of the original complaint. If the chosen official determines that additional information is needed to resolve the complaint and that an investigation at the LEA is the only way to get the necessary information, he may conduct an on-site investigation.

Once the chosen official reviews all the evidence, including the results of the on-site investigation if one was done, he must decide how to resolve DAC A's complaint. The chosen official has 60 days to make his decision from the time he first received DAC A's request for an appeal unless exceptional circumstances exist which require him to take more time. The chosen official will send copies of his written resolution to DAC A, the LEA and the SEA. This written resolution will include a notice to DAC A, the LEA and the SEA that if they are

dissatisfied with the chosen official's decision they have the right for an administrative appeal to the Assistant Secretary of Elementary and Secondary Education.

Administrative Appeal to the Secretary of Education

(Sec. 184(3), 116.246, 247, 248)

The procedures of administrative appeal are very similar to the procedures for appealing to the chosen official. If DAC A feels it should appeal to the Assistant Secretary it must appeal within 30 days after receiving the chosen official's decision. The request for an administrative appeal:

- (1) Be written and signed
- (2) Identify those parts of the chosen official's decision that DAC A disagrees with and indicate why DAC A disagrees; and
- (3) Identify and aspects of DAC A's complaint that the Deputy Assistant Secretary did not address in his decision.

DAC A should send its request for an administrative appeal to:

The Assistant Secretary of
Elementary and Secondary Education
Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Attention: Title I Complaint

The Assistant Secretary will have the option of accepting or denying DAC A's request for an appeal. The Assistant Secretary will have 60 days to make a decision if the appeal is accepted. More time will be allowed if exceptional circumstances exist. The Assistant Secretary's written decision will be sent to DAC A, DAC A's attorney if it has one, the LEA, and the SEA.

4.15.0 Summary of Requirements on Parent Involvement

Title I ESEA requires and encourages the involvement of parents at three levels -- districtwide through District Advisory Councils (DACs) in project areas or project schools through Project Area and Project School Advisory Councils (SACs), and with individual parents concerned about their children's education.

The membership of the DACs and SACs must include a majority (51 percent or more) of parents of children receiving title I services. DACs must also include two representatives of eligible project areas and children who are not currently receiving title I services. Other members of the advisory council may be teachers, more parents of title I participants, parents with children not in the program, or anyone interested who lives in the LEA.

Members of title I ESEA advisory councils must be elected, not appointed. The size of the council is not restricted by law or regulations; it should be large enough to represent the needs and interests of all concerned but small enough to create a good working situations.

While the primary role of the advisory councils is, by name, advisory, the councils also have a role to play as a watchdog of title I activities, a liaison for parents, and a final checkpoint for exceptions to certain title I rules. In the last instance, LEAs must have the consent of the DAC to rank eligible attendance areas on the basis of the degree of education deprivation rather than the normal procedures of using the percentage or numbers of children from low-income families for ranking. SAC approval is required before an LEA can designate a project area for a schoolwide project.

As a watchdog, the DAC, with the SACs feeding into it, may file a complaint if it feels title I legal requirements are not being met by the LEA. The complaint, which is normally filed with the LEA, must be specific and well-documented. Its resolution, if not satisfactory to the DAC, may be appealed to the SEA and, subsequently, to the federal Department of Education.

As a liaison to parents, DACs and SACs should encourage parents to know about the title I program and all school activities and to become involved -- as an observer, helper, or strong advocate of good educational practices at home and in school.