



engageok | **FEDERAL PROGRAMS
SUMMIT**

FY 2020 Equitable Services for Nonpublic Schools

Agenda

- Overview of Federal Programs
- LEA Responsibilities
- Nonpublic School Responsibilities
- Allocations for Nonpublic Schools
- Transferability
- Nonpublic School Carryover
- Extenuating Circumstances
- Eligible Activities
- Speaker - Amy Brewer (Positive Tomorrows)

Which Federal Programs can Nonpublic Schools participate in?

- Title IA – Improving Basic Programs Operated by State and Local Education Agencies
- Title IC – Education of Migratory Children
- Title IIA - Supporting Effective Instruction
- Title IIIA – English Language Acquisition, Language Enhancement and Academic Achievement
- Title IVA – Student Support and Academic Enrichment
- Title IVB – 21st Century Community Learning Centers

What are Equitable Services?

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

Responsibilities of the LEA - 1

- Conduct and document timely and meaningful consultation ESEA sections 1117(b) and 8501(c)
- Have a goal of reaching agreement ESEA sections 1117(b)(1) and 8501(c)(1)
- Determine proportional share of funds for providing equitable services ESEA sections 1117(a)(4)(A) and 8501(a)(4)(A)
- Provide services that meet the needs of eligible nonpublic school students and, as applicable, their teachers and families ESEA sections 1117(a)(4)(A) and 8501(a)(1)

Responsibilities of the LEA - 2

- Assessment of services ESEA sections 1117(b)(1)(D) and 8501(c)(1)(D)
- Obligate funds in the year they are received ESEA sections 1117(a)(4)(B) and 8501(a)(4)(B) ESEA sections 1117(a)(4)(B) and 8501(a)(4)(B)

Consultation - 1

Topics to discuss during consultation may include:

- How children's needs will be identified.
- What services will be offered.
- How, where, and by whom services will be provided.
- Size and scope of services.
- Amount of funds available and how it is determined.
- Delivery of services, including whether to use a third-party contractor.

Consultation - 2

Topics may also include:

- Pooling of funds
- How services will be assessed and the results used to improve services.
- Method or data source for determining the number of low-income children. (Title I specific)
- When services will be provided. (Title I specific)
- Whether to use funds in coordination with funds available under other programs. (Title I specific)

Consultation – 3

Should be:

- **OPEN** - all parties should be able to express their views, have the views seriously considered and be able to discuss viable options for ensuring equitable participation of nonpublic school students, teachers and other educational personnel
- **GOAL**- design and implement a program to meet the needs of eligible students, teachers, and other educational personnel
- **TIMELY** – nonpublic school services should start at the same time the public school students are served

Responsibilities of the Nonpublic School

- Participate in timely and meaningful consultation
- Have the goal of reaching an agreement
- Submit the notice of intent to participate
- Assist the LEA in obtaining information necessary in order to provide equitable services
- Participate in programs assessments

Allocations for Nonpublic Schools - 1

Expenditures for equitable services to eligible nonpublic school children, teachers and other educational personnel, and families “**shall be equal to the proportion of funds allocated to participating public school attendance areas**” based on the number of children from low-income families who reside in those attendance areas and attend nonpublic schools.

- *ESSA § 1117(a)(4)(A)*

Allocations for Nonpublic Schools - 2

- Each federal program under ESSA has unique guidance for determining allocations. When calculating the proportionate share of federal funding to serve nonpublic school students, their families, and teachers the SEA will base that share on the total allocation the LEA receives prior to reserving any funds for specific public school uses.
- The SEA received the federal funding and disburses it to the LEAs and informs the nonpublic school officials of the amount of funding available to serve their students, their parents and their teachers in each of the programs.

What is Transferability?

LEAs may transfer funds they receive by formula under certain programs listed under ESSA Section 8501 to other programs to better address State and local needs. ESSA amended the transferability authority by changing the programs from and to which an LEA may transfer funds and removing limits on the amount of funds that may be transferred.

Transferability - 1

LEA's may transfer from:

- Title II, Part A – Supporting Effective Instruction state grants
- Title IV, Part A – Student Support and Academic Enrichment

Transferability - 2

LEA may transfer to the following:

- Title I, Part A – Improving Basic Programs Operated by LEAs
- Title I, Part C – Education of Migratory Children
- Title I, Part D – Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk
- Title II, Part A – Supporting Effective Instruction
- Title III, Part A – English Language Acquisition and Language Enhancement
- Title IV, Part A – Student Support and Academic Enrichment Grants
- Title V, Part B – Rural Education Initiative

Transferability - 3

- Before an LEA may transfer funds from a program subject to equitable services requirements, it must engage in timely and meaningful consultation appropriate nonpublic school officials. (ESSA section 5103(e)(2).)
- With respect to the transferred funds, LEA must provide nonpublic school students and teachers equitable services under the program(s) to which, and from which, the funds are transferred, based on the total amount of funds available to each program after the transfer.

Transferability - 4

- LEAs must consult with nonpublic schools prior to transferring funds from one program to another.
- The nonpublic school must provide to the Office of Federal Programs, a statement on school letterhead with confirmation that consultation occurred prior to the LEA transferring funds from one program to another

Nonpublic School Carryover - 1

- Funds allocated to an LEA for educational services and other benefits to eligible nonpublic school children shall be obligated in the fiscal year for which the funds are received by the SEA.
- There may be extenuating circumstances in which an LEA is unable to obligate all funds within the timeframe.
- Under these circumstances, funds may remain available for the provision of equitable services under the respective program during the subsequent school year.

ESSA Section 1117(a)(4)(B) and 8501(a)(4)(B)

Nonpublic School Carryover - 2

- **Title I** – if there are no extenuating circumstances, carryover would go to the Nonpublic School share of funds
- **Title VIII Programs** – if there are no extenuating circumstances, carryover would go to the LEA share of funds
- **In both**, if there are extenuating circumstances, the carryover would go back to the Nonpublic School that the carryover initially came from

What are Extenuating Circumstances? - 1

In general, to ensure that equitable services are provided in a timely manner, an LEA must obligate the funds allocated for equitable services under all applicable programs in the year for which they are appropriated. [ESSA Sections 1117(a)(4)(B) and 8501(a)(4)(B)].

There may be extenuating circumstances, however, in which an LEA is unable to obligate all funds within this time frame in a responsible manner.

What are Extenuating Circumstances? - 2

Under these extenuating circumstances, the funds may remain available for the provision of equitable services under the respective program(s) during the subsequent school year. In determining how such carryover funds will be used, the LEA must consult with appropriate nonpublic school officials. [ESEA sections 1117(b) and 8501(c)].

Eligible Activities for Nonpublic Schools - 1

Title I, Part A – Improving the Academic Achievement of the Disadvantaged

- Materials, books, and equipment necessary to implement Title I programs;
- Tutoring services (for Title I eligible students);
- Summer/Saturday school programs;
- Computer-assisted instruction programs;
- Computers and software products;
- Family literacy programs;
- Professional development for teachers

Eligible Activities for Nonpublic Schools - 2

Title II, Part A – Supporting Effective Instruction

Professional Development may include:

- Improvement of the knowledge of teachers, principals, and other educational personnel in one or more of the core academic subjects and in effective instructional teaching strategies, methods and instructions;
- Training in effectively integrating technology into curricula and instruction;
- Training teaching methods for students with different needs, including students with disabilities or limited English proficiency, gifted talented students, etc.;

Eligible Activities for Nonpublic Schools - 3

Title II, Part A – Supporting Effective Instruction

Allowable Staff include:

- Core curriculum teachers
- Fine Arts, Foreign Language, Technology teachers
- Assistant Principals
- Principals
- Superintendent
- Nonpublic School Headmasters

Eligible Activities for Nonpublic Schools - 4

Title III, Part A - English Language Acquisition, Language Enhancement and Academic Achievement

- Certification tests
- College courses
- Conferences
- Consultants/Instructional coaches
- PD software (license must be within the fiscal year)
- Leadership development

Eligible Activities for Nonpublic Schools - 5

Title IV, Part A – Student Support and Academic Enrichment

- Consultants, or contracted individuals;
- Behavioral interventionists to support the social, economic, academic and behavioral needs of students;
- Student identification badges;
- Mental health professionals;
- Professional development related to suicide prevention, trauma, human trafficking, violence, abuse, etc.;
- New resource officer to foster safe, drug-free environments that support student academic achievement

Questions?

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Guest Speaker

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Positive Tomorrows

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