Equitable Participation

Providing Services to Private Schools with ESEA Funds

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Equitable Participation

Local Educational Agencies (LEAs) are responsible for ensuring that services agreed upon during consultation are provided to eligible, participating private schools and that the funds for such services are obligated in the fiscal year in which they are received.

DPI is responsible for ensuring LEAs provide equitable services as required by the Elementary and Secondary Education Act (ESEA).

Objectives

Support participants' efforts to successfully meet equitable participation requirements by providing an overview on the following topics:

- Consultation
- Enrollment data and calculating proportional shares
- Needs assessment — from data collection to conducting the assessment
- Planning for services

Consultation

Consultation

- **Timely, meaningful, and on-going**

- **Agreement between LEA and private school on how best to provide equitable and effective services for private school children, their teachers, and families.**

  – Certify the agreement by completing the private School Affirmation Form *after all* consultation topics have been discussed.

Consultation: Required Topics

- **Method or sources of data used to determine low-income status**

- **How student needs will be identified**

- **Size and scope of equitable services, the proportion of funds allocated for such services, and how the proportion is determined**

- **Pooling (school-by-school, within LEA, across LEAs)**

- **Services to be provided – how, when, where, whom?**

- **Process for evaluating services**

- **Coordination of funds across programs**

- **Public Control of Funds**

Consultation: Required Topics

Any decisions made by the LEA that may affect the private proportional share:

- Administrative and Indirect Costs
- Family Engagement
- Carryover
- Transferability of ESEA Funds

Public Control of Funds (an LEA's role in fiscal management)

ESEA section 1117(a)(4)(A)(ii) and (b)(1)
ESEA section 8501(a)(5)(c-d)

Working Together for Impact

Title I-A: Supporting **students with the greatest academic needs** through
- Instructional services
- Professional development for educators
- Family engagement

Title III-A: Supporting **English learners & immigrant students** through
- English language instruction
- Family & community engagement
- Professional development for school employees

Title II-A: Supporting effective instruction through
- **Professional development for teachers & principals**

Title IV-A: Supporting **academic enrichment & student support** through
- Well-rounded education
- Healthy & safe environment
- Effective use of technology

Ensuring Consultation is *Meaningful*

- Put students' welfare first

- Include both program and fiscal staff in the discussions

- Be prepared and plan ahead – provide advance notice for dates and required data elements

- Start early in the year to allow for genuine discussion and additional meetings if necessary

- Cover all required topics and ensure private school has time to ask questions/voice concerns

- Use deadlines to ensure compliance with requirements (i.e. student data, or details needed to ensure services are not delayed)

Enrollment and Poverty Data

Enrollment Data

- **Drives the amount of funding available to support private school students, their teachers, and families under each grant.**

- **LEAs are required to collect private school student enrollment data as part of the consultation process.**

  - Title I requires LEAs to identify private school students who reside within their public school attendance areas.

  - Title II and IV includes *all* students that attend a private school.

ESEA section 1117(b)(1) and 1117(a)(4)(A)(ii) and 8501(a)(5)(c-d)

Private School Name	Grade Span	Public School Attendance Area	Grade Span ↓	Attendance Area Served in Previous Year	Private school students in attendance area	Number of Low Income Private school students
Saint Jerome Parish Sch	K4-08	Greenland El	K4-04	Yes	11	1
Saint Jerome Parish Sch	K4-08	Ixonia El	K4-04	Yes	9	0
Saint Jerome Parish Sch	K4-08	Meadow View El	K4-04	No	18	2
Saint Jerome Parish Sch	K4-08	Park Lawn El	K4-04	Yes	18	6
Saint Jerome Parish Sch	K4-08	Summit El	K4-04	No	22	2
Saint Jerome Parish Sch	K4-08	Nature Hill Intermediate	05-08	Yes	28	4
Saint Jerome Parish Sch	K4-08	Silver Lake Intermediate	05-08	Yes	22	5
					Total: 128	Total: 20

(Toolbar: Save Changes | Cancel Changes | Filter List: | Clear Filter | Add New Attendance Area. "Drag a column header and drop it here to group by that column")

- Private school students should be assigned to the public school they would attend if enrolled in the district, taking into consideration their address and grade.

- Enrollment data should be included for any of the LEA's resident students attending the private school, regardless if the public school attendance area they will be assigned to has historically been served with Title I funds.

Poverty Data for Title I

- **Private schools must provide student addresses, student grades, and household income data.**

- **During consultation, the LEA should discuss what poverty data the private school has available and discuss what measure will be used.**
  - If available, the same poverty measure must be used.
  - LEA has final authority to determine the measure used.

- **The poverty threshold for determining low-income status for private school students must be consistent with the LEA's.**

- **Process can be completed every year or once every two years.**
  - The process must be consistent among the private schools.

ESEA section 1117

Poverty Measures for Title I

Option A

Using the same measure of poverty used to count public school children.

I.e. Free & Reduced Priced Lunch. (185% or lower)

Option B

Using comparable poverty data from the results of a private school parent survey (extrapolated if complete, actual data is not available.)

The private school and/or the LEA can create and administer the survey.

Option C

Comparable poverty data from a different source.

I.e. a private school has a tuition assistance program and the income threshold for the program in generally the same as the threshold used to count public school students.

Option D

Proportionality

An LEA applies the low-income percentage of each participating Title I public school attendance area to the number of private school students who reside in that attendance area.

Option E

Equated measure

An LEA uses what data they have available for private schools, for example, TANF data and correlates sources of data to determine a proportional relationship.

Funding

Private School Share

- **LEAs use student enrollment data entered in WISEgrants to determine the amount of available funding for services under each Title and communicates this estimated amount to the private school.**

- **Factors may affect the total amount of funding available under the private share:**

  - <u>Reservations:</u> Family engagement, direct and indirect administrative costs
  - Carryover
  - Transferability of ESEA Funds

Share for Title I - A

- **Calculations include the number of low income students from Title I-served Public School Attendance Areas.**

- **Private school must share addresses and student grades so LEAs can determine:**
    - The number of low-income students who reside in Title I-served attendance areas
    - If there are students who reside outside of the district, and
    - What students are eligible for services

- **Similar to the public school, students must live in Title I-served Attendance Areas _and_ have a need to be eligible for services.**

Title I Proportional Share

WISEgrants uses the public and private enrollment data to calculate the amount of available funding for services under each sub-budget (Public and Private):

	Public	Private
Current Year Low-income Enrollment in Prior Year Served Attendance Areas	457	16
Percentage of Low-income Enrollment	96.62%	3.38%
Proportional Share of TI-A funds for FY24 $197,669 = (Current Allocation + Transferred In Funds)	96.62% x $197,669 = $190,982.52	3.38% x $197,669 = $6,686.48
Carryover (Public/Private Carryover + Public/Private Carryover Transferred In)	$16,868.95	$4,964.45
Proportional Share Totals	$207,848.47	$11,650.93

Section 1117(a)(4)(A)

Title I School-level Private Shares

Private school-level shares are based on the number of low-income private school students residing within served Title I public school attendance areas *(each student meeting this criteria generates a per pupil amount).*

Per Pupil Amount =
({Percentage of Low Income Enrollment} * {Allocation + Transfer In} - {Private Reservation Amount Total} + {Private Carryover + Transfer In}) / (Private Low Income Students Served from Current Year's Served Attendance Areas)

$$(3.38\% \text{ x } \$197,669 - \$0.00 + \$4,964.45) / 6$$

$$PPA = \$1,194.82$$

Section 1117(a)(4)(A)

Proportional Shares for Titles II-A or IV-A

The proportional share calculation relies on total enrollment for the public schools and each of the participating private schools.

1. **Total Allocated Funds Available** - $57,213
   Title II-A Allocation + Allocations Transferred *from* another Title - Allocation Transferred to another Title

2. **Amount Available for Title II-A Services** - $57,213
   Total Allocated Funds Available - Administration Reservation

3. **Per Pupil Amount (PPA) for Title II-A Services** - $24.0998
   Amount Available / Total Public **and** Private Enrollment Enrollment

Section 8501(a)(4)

Proportional Shares for Titles II-A or IV-A

4. **Private School Amount -** $5,952.66
   Total Participating Private School Enrollment * PPA
5. **Private School Carryover (if applicable) -** $9,169.27
   Private School Carryover from previous year + Private School
   Carryover Transferred *from* another Title - Private School Carryover
   Transferred *to* another Title
6. **Total Private School Amount (including Carryover) -** $15,121.93
7. **Private School Per Pupil Amount (including Carryover) -** $61.2224

Private School A	Private School B
78 Students * $61.2224 = $4,775.35	169 Students * $61.2224 = $10,349.58

Share for Title III

2023-2024 State's Allocation $6,840,902	÷	Number of Students Administered the ACCESS Test in 2022-2023 58,136	=	2023-2024 Per Pupil Amount $117.67
2023-2024 Per Pupil Amount $117.67	✖	Number of Students Administered the ACCESS Test in 2022-2023 in the School	=	Share for the Private School

Needs Assessment and Planning for Services

Planning for Services

Factors to Consider:

- The needs assessment data
- The amount of available funding
- The number of eligible private school students
- Services that may be provided
- Location of private school
- When, how, by whom, and where the services will be provided
- Any preferences of the private school(s)
- How services can be evaluated for effectiveness
- Evaluate the prior year's services (what worked, what didn't)

Needs Assessment

ESEA funding must be used to support students with academic needs:

- Required part of the consultation process for all Titles in which a private school is participating

- Determine the educational needs of private school students, their teachers, and families

- Use results to identify the services that will provide the most benefit to the private school students

Collecting Assessment Data

Private schools may not have the same data available as the LEA. Focus on the types of data *available*, which may include:

- Scores on standardized tests (e.g., Forward Exam, IOWA, STAR, PALS, etc.)

- Classroom assessments, including formative and summative (e.g., iReady, MAPS, etc.)

- Portfolio of student work

- Writing samples

- Teacher recommendations

- Input from families

- Report card grades

Data from private schools can and may be different from the data collected and used in the assessment process for the LEA's public schools.

Title IV Needs Assessment

The private school collects available data for *all* students to prioritize areas of greatest need for the students at the school.

The LEA and private school review the available data together.

ASK: What is the data showing us about student needs? What are the areas of greatest need? What services would best meet *all* of the private school's students' needs ?

Title IV services and benefits cover well-rounded education, safe and healthy schools, and effective use of technology.

Title IV Services

Supplemental services that address one or more priorities of Title IV-A within the private school. These supported priorities include:

- Well-Rounded Educational Opportunities
- Safe and Healthy Students
- Effective Use of Technology

Title IV Services

Allowed costs include:

- Staff and professional development to support the greatest academic needs

- Mental health counselors

- Supplies and instructional materials to support the greatest academic needs

Title II Needs Assessment

The private school collects available data for *all* students to prioritize areas of greatest need for the students at the school.

The LEA and private school review the available data together.

ASK: What is the data showing us about *all* of the students needs? What evidence-based professional development would support the teachers in meeting these needs?

Title II covers targeted professional development for teachers and instructional staff

Title II Services

Support the greatest needs of *all* students in core subjects as well as other areas that impede students' academic achievement through high quality professional development provided to teachers and private school staff (including paraprofessionals, principals, and other school leaders).

Title II Services

Professional Development Must:

- Improve content knowledge or classroom practice or
- Address student behavior in the classroom and identify early interventions to help students with special needs

Allowed costs for professional developments include:

- Conference registration, transportation and lodging
- Stipends to Private School Staff in excess of staffs' contracted time
- Supplies, books, or instructional resources

Title III Needs Assessment

The private school collects available data for *identified EL students* to prioritize areas of greatest need. The LEA reviews ACCESS test data.

The LEA and private school review the available data together, including ACCESS test results.

ASK: What is the data showing us about EL student needs? What services would best meet EL students' needs? What does the data show us about the needs of EL students' families? What services would best meet the needs of EL students' families?

Direct instruction for EL students should always be considered first. Title III also covers professional development for teachers working with EL students and family engagement activities.

Title III Services

Services to support English Learners (ELs) in core subjects,

as well as other areas that impede a student's academic

achievement through one or more of the following:

- Direct Instruction

- Professional Development

- Family Engagement

Title III Services

Allowed costs include:

- Teachers and paraprofessionals supporting the EL students

- Supplies and instructional materials for EL students

- Family engagement activities for EL students

Direct instruction for eligible students should always be considered first.

Title I Needs Assessment

The private school collects available data for their *eligible students* at risk or most at risk of failing to meet rigorous academic standards in their school setting.

The LEA and private school review the available data together.

ASK: What is the data showing us about eligible student needs? What are the areas of greatest need? What services will best meet the needs of the eligible students at risk or most at risk of failing? What professional development do teachers with Title I students in their classrooms need? What do Title I students' families need?

Direct instructional services must always be considered first. Title I also covers professional development for teachers working with Title I students in their classrooms and family engagement activities.

Determining Eligibility for Title I Services

Private school student resides in a Title I served public school attendance area	**+**	Private school student is most at risk of failing to meet academic standards	**→**	Private school student is eligible for Title I services

Title I Services

Direct services that support eligible students in core subjects, as well as other areas that impede a student's academic achievement such as:

- Reading, math, science, social studies, behavioral health, socio-emotional health, etc.

Other services may include:

- Professional development to support Title I students' needs, family engagement activities for families of Title I students, and any necessary materials, supplies, or equipment to support the services.

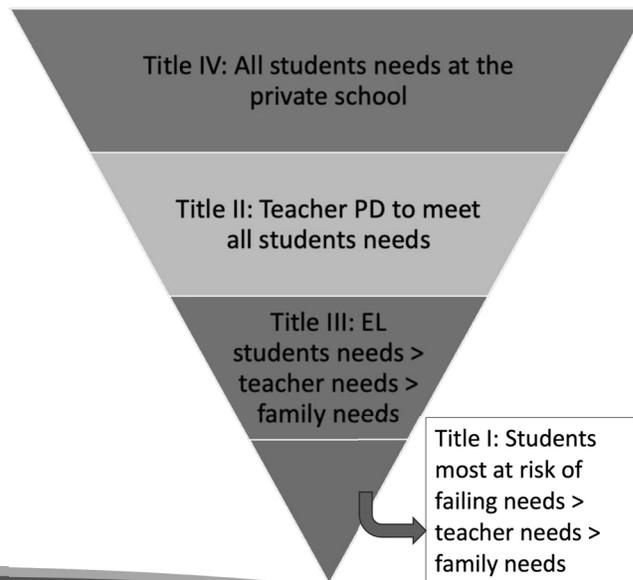*Direct instruction for eligible students must always be considered first.*

Title I Services

Allowed costs include:

- Teachers and paraprofessionals supporting the eligible students with the greatest academic needs

- Before or after school programming for Title I students

- Supplies and instructional materials for Title I services

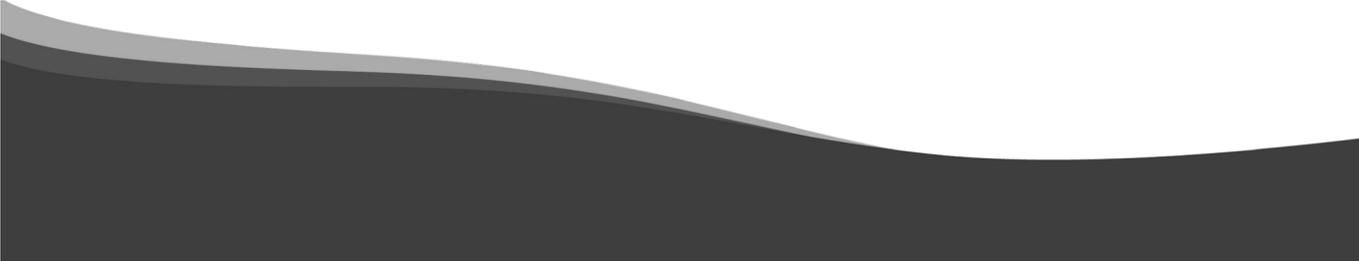- Family engagement activities for students receiving Title I services

Simply providing materials and supplies is not considered a viable TI program and is considered unallowable.

Cohesion across ESEA Titles

Title IV: All students needs at the private school

Title II: Teacher PD to meet all students needs

Title III: EL students needs > teacher needs > family needs

Title I: Students most at risk of failing needs > teacher needs > family needs

Title I Services Across LEAs

Title I Services Across LEAs

Under Title I, the LEA where a student resides (Student Resident LEA) is responsible for ensuring eligible students receive services.

When consulting with private schools, an LEA must:

- Identify students who reside in an outside LEA, then
- Inform that LEA and provide them with enrollment data, including poverty information.

LEAs should contact neighboring LEAs to confirm whether they have any resident students in private schools located in these other districts.

Title I Services Across LEAs

If an LEA has resident students in a private school outside the LEA:

- **Determine the services that will be provided and how by considering the following:**
  - Can the Student Resident LEA provide services?
  - Can the LEA where the private school is located provide services?
  - Will a third-party vendor provide services?
  - Does the private school have a preference when considering all the above options?

- **Ensure any agreements are in place and documented (if applicable).**

- **Confirm services are provided as planned.**

Develop a Plan for Services

Developing a Plan for Services

LEAs must document the plan for services during the consultation process. LEAs will be required to submit such documentation to DPI for monitoring purposes.

- Document discussions when planning for services

- Document the final decisions

- Make the documentation accessible for both the public and private school officials

Available Resource:
DPI's Planning Template to Support LEAs in Providing Equitable Services

Developing a Plan for Services

Incorporate ongoing consultation and deadlines into the plan:

- **Schedule dates for the LEA and private school staff to connect throughout the school year.**

- **LEAs have the authority to establish deadlines for a private school to meet equitable participation requirements:**

  - Discuss deadlines during initial consultation(s) and include them in the plan for services

  - Deadlines can help ensure requested data is provided or follow-up occurs in a timely manner, so as not to impede the application process and implementation of services

Evaluating Services

- How will the services be evaluated for effectiveness throughout the school year?

- What can be learned from any prior year services?

- What process is in place to modify services?

Ensuring Services Are Provided

Delivery of Services

An LEA is responsible for ensuring the agreed upon services are provided and that funds are obligated in the fiscal year in which they are received

- **Active participation by the private school is necessary**

- **An LEA can help foster the active participation through:**
    - Ongoing consultation
    - Utilization of deadlines
    - Referencing written evidence of the services plan

ESEA section 1117(a)(4)(B) and 8501(a)(4)(A))

Obligation of Funds

- **LEA maintains all control of ESEA funds**

- **LEAs are responsible for obligating funds**
    - Private schools cannot enter into contracts for services
    - Invoices cannot be in the private school's name

- **LEAs cannot reimburse private schools for purchases**

ESEA section 1117(a)(4)(B) and (d)(1))

ESSA Ombudsman

- Monitors and enforces equitable participation of private schools in federal education programs covered by ESEA

- Provides technical assistance to LEAs and private schools in consultation for the goal of reaching agreement; and

- Engages with public and private stakeholders to determine how best to support their relationships.

(Item E-1, USDE, Providing Equitable Services to Eligible Private School Children, Teachers, and Families Non-Regulatory Guidance, October 7, 2019)

Equitable Participation Resources

- DPI Consultation Toolkit for Private School Equitable Participation
- USDE Providing Equitable Services Non-Regulatory Guidance (Title I) (revised May 2023)
- USDE Providing Equitable Services Non-Regulatory Guidance (Title VIII) (July 2023)
- ESEA Equitable Participation Webpages
- Providing Services for Equitable Participation - Roles and Responsibilities
- Title I Services for Private School Students Attending a Private School Located in a Different LEA
- English Learners in Private Schools (Title III)
- When a Private School Does Not Respond to an LEA's Attempts to Consult

We want to hear from you.

What type of technical assistance and support would be the most beneficial to your LEA regarding equitable participation? What topics?

https://forms.gle/FUvJ1cncsKHroaf78

Contact Information

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