

# ESEA Equitable Participation: Providing Services to Private School Students

Federal Funding Conference

February 2021

# Session Objective

To introduce participants to the ESEA requirements for private school equitable participation by:

- Providing a brief overview of consultation requirements
- Providing a brief overview of enrollment data and how proportional shares are calculated
- Discussing the importance of collecting assessment data and conducting a needs assessment
- Examining how the needs assessment drives the planning of services
- Examining the LEA's roles and responsibilities as fiscal agent regarding those services



# Consultation



# Overview: Consultation

- Must be timely and meaningful
- The LEA and private school should reach agreement on how best to provide equitable and effective programs for eligible private school students
- Agreement must be certified in Private School Affirmation Form
- Must be ongoing



# Consultation - Required Topics

- Method or sources of data used to determine low-income status
- How a student's needs will be identified
- The size and scope of the equitable services, the proportion of funds that is allocated for such services, and how that proportion is determined
- Pooling (school-by-school, within the LEA, across LEAs)
- Services to be provided:
  - How, when, where, and by whom?
  - How will the effectiveness of services be evaluated?
- Coordination of funds across programs

# Consultation - Fiscal Topics

- Administrative and Indirect Costs
- Family Engagement
- Carryover
- Transferability of ESEA Funds
- LEA's Roles and Responsibilities in Fiscal Management



# Determining Available Funding



# Proportional Share Calculations

- [Title I-A Equitable Share Calculator](#)
- [Title II-A Equitable Share Calculator](#)
- [Title IV-A Equitable Share Calculator](#)

- Title III-A

$$\begin{array}{|c|} \hline 2020-21 \text{ State's} \\ \text{Allocation} \\ \$7,000,000 \\ \hline \end{array} \div \begin{array}{|c|} \hline \text{Total \# of} \\ \text{Students} \\ \text{Administered the} \\ \text{ACCESS Test in} \\ \text{2019-20} \\ 45,000 \\ \hline \end{array} = \begin{array}{|c|} \hline 2020-21 \\ \text{Per Pupil} \\ \text{Amount} \\ \$155.55 \\ \hline \end{array}$$

Each proportional share is calculated in WISEgrants as part of the applicable Title application.



# Private School Poverty Data for Title I

- Private schools must provide poverty data
- If available, the same method for measuring poverty data should be used for both the LEA and private school
- LEA has the final authority to determine the method used to calculate the number of children, ages 5-17, who are from low-income families and attend private schools
- Regardless of the method used, the poverty threshold for determining low-income status must be consistent across the LEA
- This can be completed every year or once every two years



# Private School Poverty Data 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 is 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.



# Assessing Private School Students Needs



# Needs Assessment

Title funding must be used to support the students identified as having the most academic need and to support the private school in meeting these needs.

Because of this requirement, a **needs assessment** is:

- Necessary to determine the educational needs of private school students
- A required part of the consultation process
- Determines what services will provide the most benefit



# Collecting Assessment Data

*So, what type of data should be considered for the needs assessment?*

Private schools may not always have the same data available as the LEA. So, the LEA and private school need to discuss what data is available.

Data can include:

- Scores on standardized tests (e.g. Forward Exam, IOWA, STAR, PALS, etc.)
- Classroom assessments, including formative and summative (e.g. iReady, MAPS, etc.)
- A 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.*

# Collecting Assessment Data

For **Title I**, an LEA should focus on collecting and reviewing data only for potential TI eligible private school students.

- A potentially eligible private school student is a student that resides in an LEA's Title I-served public school attendance area **AND** is at risk or most at risk of failing to meet rigorous academic standards within their school setting.



# Determining Educational Need for Title I

As part of the needs assessment, the LEA and private school select multiple criteria to determine educational need.

- Determining educational need helps identify students who are at risk of failing to meet the academic standards
- Eligible students are ranked on these areas of greatest need to prioritize those who should receive services
- This ensures services align with the actual needs of the students.

*\*The areas of greatest need identified for the private school students may vary from those identified for the public school students in the LEA. **This is okay**, and may result in Title I services varying between the public school and even between different private schools.*



# Determining Needs for Other Titles

When determining needs for Titles II and IV, the LEA and private school review available data for all students at the school to prioritize the areas of greatest need for the students at the school.

- Title II addresses these prioritized needs through targeted professional development for teachers and instructional staff at the school.
- Title IV addresses these student needs through services and benefits covered under one or more of the three categories: well-rounded education, safe and healthy schools and effective use of technology.

When determining needs for Title III, the LEA and private school review ESL student ACCESS test results, as well as available student data to determine the area or areas of prioritized need for each ESL student. Much like Title I, direct instruction for ESL students should always be considered first.



# Planning for Services



# Factors to Consider

There are many factors to consider when planning for services under equitable participation. These factors include:

- Needs assessment data
- The amount of available funding
- The number of identified eligible private school students
- What services will be provided
- Location of private school compared to LEA's public schools
- When, how, by whom, and where the services will be provided
- Preferences of private school participants
- An evaluation of the prior year's services (what worked and what didn't)
- How services provided can be evaluated for effectiveness



# Factor: What Services will be Provided

## *For Title I, what types of services can be considered?*

Services can support 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
- For programs that include foreign language immersion, instruction in the primary language used during the school's academic program.

Other uses include professional development, family engagement activities, and any necessary materials, supplies, or equipment to support the services.

*\*Direct instruction for eligible students should always be considered first.*

# Title I Services Across LEA Boundaries

This topic is more complicated than the time allotted for this presentation. To ensure all details are given appropriate consideration, please refer to this newly developed technical assistance:

[Title I Services for Private School Students Attending a Private School Located in a Different LEA](#)

Please feel free to contact us directly with any questions.



# Factor: What Services will be Provided

## *For Title II, what types of services can be considered?*

Services support the greatest needs of 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. These can include:

- **Professional Development**
  - Improve content knowledge or classroom practice of teachers, paraprofessionals, principals, and other school leaders
  - Address student behavior in the classroom and identifying early interventions to help students with special needs
  - Conference registration for Title II funded professional learning activities
  - Expenses for transportation, per diem, and lodging if the costs are reasonable and necessary
- **Stipends to Private School Staff**
  - Teachers leading or participating in trainings to improve content knowledge or classroom practice
  - Teacher and paras participating in professional learning outside of regular contracted school day/year
  - Teacher mentors or coaches
- **Supplies and Materials**
  - Professional learning, such as books or instructional resources
  - Professional learning activity supplies, such as chart paper, pens, binders, easels
  - Printing or copying for professional learning activities.

# Factor: What Services will be Provided

*For Title III, what types of services can be considered?*

Services support English as a Second Language Learners (ESLs) 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

*Services for ESLs must supplement and not supplant services that would need to be provided to meet these students needs in the absence of federal funds.*

*\*Direct instruction for eligible students should always be considered first.*



# Factor: What Services will be Provided

## *For Title IV, what types of services can be considered?*

Funds may be used to provide supplemental services that address one or more priorities of this grant within the private school. These supported priorities include:

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

Funds may be used for, but not limited to the following: direct services, professional development, and materials/supplies



# Factor: How Services will be Provided

*How do you determine when, how, by whom, and where services will be provided?*

- **How and when will services take place? Considerations:**
  - What services can the LEA provide? How do these services work for the private school?
  - Will services be provided before or after school? In a pull-out model? On weekends? In the summer?
  - Are there certain days of the week that work best?
  - How will the LEA ensure the students aren't repeatedly being pulled-out of the same classes?
- **Who will provide the services? Considerations:**
  - What is the LEA's staff capacity?
  - Will the LEA contract with a third party provider?
  - Will the LEA contract with a teacher at the private school?

**Remember: public and private staff providing instructional services must be appropriately licensed.**
- **Where will services be provided? Considerations:**
  - Where is the private school located in relation to the LEA's public schools?
  - Will the distance act as a barrier for who can provide services or how often?

# Factor: Learning from Prior Years

## *What can be learned from any prior year services?*

Evaluating past services helps identify successes and address challenges or areas for improvement. Considerations include:

- Are the same students receiving services every year?
- Were students successfully exited from the program?
- What kind of progress did these students make?
- Were there any barriers impeding students from making progress?
- Are there long term goals for eligible private school students that should be considered?
- How successful were past years' services in meeting these long term goals?
- Do any goals need to be reevaluated or modified to better meet these goals?
- What could make the services more effective?
- Is there room for teacher professional development that could make these programs more effective?

# Factor: Evaluating Services throughout the Year

## *Can the services be evaluated for effectiveness throughout the school year?*

To ensure services effectively meet the needs of students, the LEA and private school should discuss ways that services can be evaluated and modified as the services are provided. **Considerations:**

- Who should be included in the evaluation process? (Note: the LEA is ultimately responsible for evaluating the effectiveness of any services or benefits provided to the private school.)
- What information is vital for evaluating program outcomes? (i.e. teacher observations, grades, assessment data)
- What kinds of assessments will the LEA and/or private school use?
- How will evaluation results be shared?
- Is there firm exit criteria in place for eligible students receiving services?
- What is the process for making decisions related to modifying services?



# Developing a Plan for Services



# Developing a Plan for Services

- The LEA and private school should document discussions around all aforementioned factors when planning for services.
- As decisions around services are made, document those final decisions.
- Documentation of the discussion and final decisions serves the interests of both the LEA and private school:
  - Written evidence of any final decisions allows for easy confirmation and verification regarding the agreements reached by both parties.

**Recommendation: LEAs incorporate written evidence of the plan for services into their consultation process.**



# Developing a Plan for Services

## A written version of the plan for services should include:

- The educational criteria used to determine the needs of eligible private school students and to identify what students should receive services under each Title
- A description of the services to be provided, including any family engagement activities (if applicable)
- How and when services will be provided, as well as who will provide services (i.e. either LEA staff, private school teacher under contract with the LEA, or a third-party vendor or vendors)
- Any professional development to be provided to private school teachers and other personnel, including the date it will occur and who will be attending
- Whether funding will be used to purchase any materials, supplies, or equipment to support the services
- How services will be evaluated and modified throughout the school year

# Developing a Plan for Services

Incorporate ongoing consultation and deadlines into the plan for services

- Remember an LEA has the authority to establish deadlines for a private school to meet when providing requested information or follow-up
- Discuss these deadlines during the initial consultation and include them in the plan. Since consultation is ongoing, schedule additional dates for the appropriate LEA and private school staff to connect

The written should be plan accessible so it can easily be referenced throughout the year, during the implementation of services, and ongoing consultation. This will help mitigate a delay in services and ensure that student needs are being met.



# Ensuring Services are Provided



# Delivery of Services

An LEA is responsible for ensuring that the agreed upon services are provided and that funds are obligated in the fiscal year in which they are received (Obligation of Funds).



# Obligation of Funds

- Funds available for equitable services must be obligated in the fiscal year for which the funds are received by the LEA.
- LEA maintains all control of Title funds.
- Private schools may not obligate or receive Title funds, even as a reimbursement.



# Universal Monitoring for Equitable Participation

2020-21 is the second year DPI has implemented this practice:

- LEAs who do not claim any funds for private school services in the prior year under a Title are identified
- Terms and conditions are added to the grant subaward to ensure compliance
  - Ex: December 31, 2020 for expenditures incurred and paid July 2020 through Fall 2020
- DPI staff and the ESSA Ombudsman will connect with LEA staff for meaningful discussions around requirements and processes



# ESSA Ombudsman

- The purpose of the Ombudsman is to monitor and enforce equitable participation of private schools in federal education programs covered by the ESEA
- To provide technical assistance to LEAs and private schools in consultation for the goal of reaching agreement
- To proactively engage public and private stakeholders in how best to support their relationships



# Equitable Participation Resources

- [Providing Equitable Services to Eligible Private School Children, Teachers, & Families Non-Regulatory Guidance \(Title I\)](#)
- [ESEA Equitable Participation Webpage](#)
- [Providing Services for Equitable Participation Under the Federal Every Student Succeeds Act \(Roles and Responsibilities\)](#)
- [Equitable Participation: Important Facts Regarding Requirements for ESEA and CARES Act \(ESSER and GEER\)](#)
- [Equitable Participation in Title I for Private School Students](#)
- [Title I Services for Private School Students Attending a Private School Located in a Different LEA](#)
- [Title II, Part A Webpage](#)
- [English Learners in Private Schools \(Title III\)](#)
- [Title IV Equitable Participation Webpage](#)
- [When a Private School Does Not Respond to an LEA's Attempts to Consult](#)

# Contact Us

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