

# Private Schools 101

Title I Directors Academy: Part IV  
Discovering What You Need To Do For Equitable Services  
In Private School Programs

2015 Annual GCEL Conference  
March 2-4, 2015  
Savannah, GA Riverfront Marriott

## Presenters

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## SCHOOL IMPROVEMENT & DISTRICT EFFECTIVENESS





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# Workshop Purpose

- To offer centralized guidance and support to district and private school officials working with Title I programs.
- To ensure uniformity in the implementation of the Title I Private School Provisions in ESEA
  - Consultation
  - Identifying eligible participants
  - Ensuring equitable participation of private school students
  - Ensuring equitable participation of private school teachers and families of Title I participants
  - Ensuring equitable set-asides

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# Guidance



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# Guidance

The Elementary and Secondary Education Act of 1965 (ESEA) provides benefits to private school students, teachers and other education personnel, including those in religiously affiliated schools.

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# Guidance

Section 1120 of the Title I, Part A ESEA requires a participating district to provide eligible children attending private elementary and secondary schools, their teachers, and their families with Title I services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families.

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# Guidance

Title I, Part A funds are aimed at children who are at-risk of failing to meet the state's student academic achievement standards or *other more appropriate standards for private school Title I students as determined in consultation.*

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# Guidance

## Federal programs with equitable participation requirements:

- Title I, Part A – Improving Basic Provisions
- Title I, Part B – Even Start Family Literacy
- Title I, Part C – Education of Migratory Children
- Title II, Part A – Teacher and Principal Quality
- Title II, Part B – Mathematics and Science Partnership
- Title II, Part D – Enhancing Education Through Technology
- Title III, Part A – Language Instruction for Limited English Proficient and Immigrant Students (ESOL)
- Title IV, Part B – 21<sup>st</sup> Century Community Districting Centers

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# Roles and Responsibilities

## Who is responsible for planning and designing services for eligible private school students?

- Through the consultation process, the district must design a program that meets the needs of the private school and its students.
- The district is responsible for planning, designing and implementing the Title I program and SHALL NOT delegate that responsibility to the private school.

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# Roles and Responsibilities

## District Officials will:

- Provide educational services or other benefits on an equitable basis, and in a timely manner to eligible children who are enrolled in private elementary and secondary schools.
- Ensure that teachers and families of participating private school children participate on a basis equitable to the participation of teachers and families of public school children receiving these services.
- Consult with appropriate officials of private schools during the design and development of the district's program for eligible private school children.

# Roles and Responsibilities

## Private School Officials:

- Participate in consultation sessions.
- Provide list of addresses and grade levels of low-income families.
- Provide list of names, addresses, and grade levels of children who meet the multiple, educationally-related, objective criteria for participation eligibility.
- Ensure that poverty is not be used for identification or services. Poverty is used only to determine funding allocation.



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# Roles and Responsibilities

## Private School Officials:

- Suggest ideas, program designs, and modifications that meet the needs of their eligible children, their teachers, and their families.
- Provide a dedicated space for instruction, if appropriate.

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# Roles and Responsibilities

## Private School Officials:

- Collaborate with the district officials to ensure Title I funds are only used to purchase materials and equipment to meet the needs of participating private school students.
- Ensure non-Title I private school students do not use materials and equipment purchased with Title I funds. These guidelines are discussed and documented at a consultation meeting with private school officials.

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# Equipment Use for Participating Private Schools

- Section 1120(d)(1) of the ESEA requires that the control of the Title I funds, and the ownership of the materials and equipment, purchased with Title I funds for private schools shall be in the LEA, and the LEA shall administer the funds, materials, equipment and property. This is an LEA responsibility rather than the responsibility of the private school.

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# Consultation





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# Consultation

## What is Consultation?

- It is planning discussions between public and private school officials.
- It provides a genuine opportunity for all parties to express their views and to have those views considered.
- Successful consultation establishes positive and productive working relationships.

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# Consultation

## Timely and Meaningful Consultation

- To ensure timely and meaningful consultation, the district must consult with private school officials prior to the district making any decision that affects the opportunities of any private school children to participate in programs.

Requirements in ESEA Section 1120(b) and 200.63 regulations

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# Consultation

## Regulatory Requirements for Consultation

- How the district will identify the needs of eligible private school children.
- What services the district will offer to eligible private school children.
- How, where and by whom the district will provide services to eligible private school children?
- How the district will assess academically the services provided and how the district will use the results of that assessment to improve services.

[Sec.1120(b)(1) ESEA]

# Consultation

## Regulatory Requirements for Consultation

- The size and scope of the equitable services that the district will provide to eligible private school children and the proportion of its Title I funds that the district will allocate and reserve.
- The method, or sources of data, the district will use to determine private school children from low-income families residing in participating public school attendance areas.
- How and when the district will make decisions about the delivery of services.



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# Consultation

## Regulatory Requirements for Consultation

- How the district will involve families in the Title I program.
- What professional development activities the district will offer to the private school teachers of Title I participants.

### *NOTE:*

If the district disagrees with the views of the private school official on the provision of services through a contract, district officials must provide in writing to the private school officials an analysis of the reasons why the district has chosen not to use a contractor.

# Consultation

## Consultation Steps

- **In the fall**, the district contacts private school officials with children who reside in the district boundaries regardless of private school location and have a written returned receipt verifying that contact was made.
- District provides the Intent to Participate Form to the private school who must complete and return it *if they are interested in participation in the following school year.*

# Consultation

## Consultation Steps

- District convenes a meeting to discuss needs and service options.
  - Phone conversations and letters are not adequate.
- District must obtain a written affirmation from private school officials stating that timely and meaningful consultation occurred.
- District must keep documentation on file for review during cross- functional monitoring.



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# Documenting Consultation

## Retain documentation that shows the District

- Informed private school officials of available federal programs.
- Engaged in timely and meaningful consultation.
- Identified private schools' needs.
- Allocated sufficient funds for private schools.
- Provided equitable services and benefits.
- Evaluated programs and services for effectiveness.
- Adequately addressed problems and complaints.



# Consultation

## Sample Documentation

- Initial consultation
  - Agendas
  - Sign-in sheets
  - Supporting documentation (most current DE 1111 Forms, letters mailed with return receipts, responses from private schools)
- On-going meaningful and timely consultations
  - Agendas
  - Sign-in sheets
  - Minutes



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# Consultation

## Sample Documentation

- Complaints and/or problems documents
- Consultation affirmation form, signed
- Equitable services affirmation form, signed

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# Consultation

## Disagreements and Complaints

- Consultation does not guarantee that private school officials will agree with the district's decisions regarding Title I services.
- Private school officials may not be satisfied that their views were adequately considered during the process of initial consultation.
- District must develop procedures that will address any private school complaints.



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# Consultation

## Disagreements and Complaints

- It is the district's responsibility to inform private school officials of their right to complain and the procedure to follow in filing a complaint.
- If private schools believe that the district did not engage in a timely and meaningful consultation process or did not consider their views, a complaint may be filed.
- The complaint goes to the state education agency (SEA) and the district must forward any relevant documentation about the dispute to the SEA.

# Allocation of Title I Funds

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# Allocation of Title I Funds

There are two ways in which private schools participate in Title I programs.

Through ...

- Per Pupil Allocation of Title I Funds
- Equitable Participation in Programs

*Control of Title I funds and title to materials, equipment, and property purchased with such funds shall be in a public agency.*

*[ESEA, §1120 (d): Public Control of Funds]*



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# Allocation of Title I Funds

Two options:

- **School-by-School:** Provide equitable services to eligible children in each private school with the funds generated by the children from low income families who attend that school.
- **Pooling:** Combine the funds generated by all private school children from low-income families in selected schools to use for students with greatest educational need among those schools in the LEA (shared resources).



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# Allocation of Title I Funds

- The district must determine the equitable amount for private schools(s) teachers, families and other reserved funds.
- The use of reserved funds is decided during the consultation phase.

**The LEA must maintain control of funds.**

**No reimbursements!**

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# Allocation of Title I Funds

## Determining Private School Allocations

Eligible Students are private school students from low-income families who reside in Title I participating public school attendance areas

# Allocation of Title I Funds



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## Per Pupil Allocation (PPA)

- Private school students from low-income families who reside in Title I participating public school attendance areas
- Multiply the number of private school poverty students by the participating public school per pupil allocation.
- Funds are used for instructional activities.

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# Allocation of Title I Funds

## Calculating Equitable Participation

- Determine the number of private school students from low-income families who reside in Title I participating public school attendance areas.
- Multiply the percentage of eligible private school students by the district set-aside; and
- Determine the services to be provided based on the equitable dollar amount.

# Allocation of Title I Funds

## Equitable Participation

- An equitable proportional amount goes to private school if district wide activities are set-aside in the following areas:
  - Instruction
    - Summer School
    - After School
  - Professional Learning
    - Academic Coaches
    - District wide professional learning activities
    - Highly Qualified Professional Learning
  - Parental Involvement

# Allocation of Title I Funds

## Use of Funds for Equitable Services

### **Instructional**

- Services to Eligible Participating Students
  - Instructional Support – materials
  - District Paid Instructional Staff – tutors, small group instruction

### **Parental Involvement**

- Services to Parents of Eligible Participating Student



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# Allocation of Title I Funds

## Use of Funds for Equitable Services

### Professional Learning

- Training for private school teachers of eligible participating students;
- Not for district paid teachers of eligible participating students;
- Arranged by the district through consultation with private school officials;

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# Allocation of Title I Funds

## Use of Funds for Equitable Services

### **Professional Learning**

- Private schools cannot arrange for professional learning and then submit for reimbursement;
- Reimbursement for substitutes is not an allowable expenditure.

# Allocation of Title I Funds

Equitable Service does ***not*** apply to the following set-asides:

- Required Flexible Learning Programs set-asides
- Additional Priority, Focus and Alert Schools set-asides
- NCLB Choice Transportation set-asides
- Homeless set-aside
- Neglected and Delinquent set-aside
- Pre-School set-asides
- Administrative set-asides





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# Allocation of Title I Funds

## Use of Funds for Equitable Services

### Reminder

- Private schools are not to be reimbursed for services and materials provided. The district is responsible for private school program implementation.

# Ensuring Equitable Participation

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# Ensuring Equitable Participation

To ensure equitable participation, the district or other entity receiving federal financial assistance must:

- Assess, address, and evaluate the needs of private school students and teachers through consultation;
- Determine amount of funds per student;
- Provide private school students and teachers with an opportunity to participate in activities equivalent to the opportunity provided to public school students and teachers; and
- Offer services that are secular, neutral and non-ideological.



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# Ensuring Equitable Participation

Services are equitable, if the district—

- Addresses and assesses the specific needs and educational progress of eligible private school children on a comparable basis as public school children;
- Meets the equal expenditure requirements for instructional programs, and professional development and parental involvement activities;

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# Ensuring Equitable Participation

Services are equitable, if the district—

- Provides private school children with an opportunity to excel and achieve equitable to the opportunity provided to public school children; and
- Provides promise of private school children reaching high levels of academic achievement.

# Samples of Embedded GaDOE Worksheets

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# Worksheets

## Private School Per Pupil Allocation (PPA) Worksheet:

- Embedded in Consolidated Application

## Private School Equitable Participation Worksheet:

- Embedded in Consolidated Application

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https://portal.doe.k12.ga.us/ConsolidatedApp.aspx

Consolidated Application

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**Consolidated Application**

Allocations for this year (2015) : \$3,901,832.00

Additional Allocation : \$0.00

Carryover from previous year : \$0.00

Transfer Amount : \$0.00

Total Budgeted Funds for this Fiscal Year : \$3,901,832.00 Unallocated Funds : \$0.00

Fiscal Effort Set Asides Other Funds School Allocations Eligible Attendance Areas Data Collection

Public Schools Private Schools Private School Proportionality

Print | Sign-Off | Request Revision | Create Amendment

Attendance areas and school allocation details											
Private School	Public School	PPA	# of Poverty Children	Dollar Amt. Earned for Instr. Srvc.	# of Eligible Students	Reading	Mathematics	Teachers	Parapro	Type	
St. Francis Xavier Catholic School	Burroughs-Molette Elementary School	\$750	4	\$3,000	1	1	0	0	0	Private School	
St. Francis Xavier Catholic School	Glyndale Elementary School	\$675	1	\$675	1	1	1	0	0	Private School	
St. Francis Xavier Catholic School	Glynn Middle	\$405	3	\$1,215	2	1	2	0	0	Private School	
St. Francis Xavier Catholic School	Golden Isles Elementary School	\$672	7	\$4,704	0	0	0	0	0	Private School	
St. Francis Xavier Catholic School	Goodyear Elementary School	\$677	1	\$677	0	0	0	0	0	Private School	
St. Francis Xavier Catholic School	Greer Elementary School	\$478	1	\$478	3	3	0	0	0	Private School	
St. Francis Xavier Catholic School	Jane Macon Middle	\$479	1	\$479	1	0	1	0	0	Private School	
St. Francis Xavier Catholic School	Needwood Middle School	\$480	1	\$480	3	2	3	0	0	Private School	
St. Francis Xavier Catholic School	Satilla Marsh Elementary School	\$423	1	\$423	2	1	1	0	0	Private School	
St. Francis Xavier Catholic School	St. Simons Elementary School	\$670	2	\$1,340	2	2	2	0	0	Private School	
St. Francis Xavier Catholic School	Sterling Elementary School	\$671	1	\$671	0	0	0	0	0	Private School	
St. Francis Xavier Catholic School	Altama Elementary School	\$676	0	\$0	3	3	2	0	0	Private School	
<b>Total:</b>			23	\$14,142	18	14	12				

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### Consolidated Application

Status : Approved (Date: 11/17/2014 16:02:40) Superintendent Sign off date : 11/17/2014 15:28:14

Program Information	Budget	Audit Trail	Assurances	Programs
Allocations for this year (2015) :	\$1,655,743.00			
Additional Allocation :	\$0.00			
Carryover from previous year :	\$0.00			
Transfer Amount :	\$0.00			
<b>Total Budgeted Funds for this Fiscal Year :</b>	<b>\$1,655,743.00</b>	<b>Unallocated Funds :</b>	<b>\$0.00</b>	

Fiscal Effort	Set Asides	Other Funds	School Allocations	Eligible Attendance Areas	Data Collection
Print   Save   Submit   Request Revision					

Select Data Collection Form: Equitable Svc. Overview

**Overview**

1. Select the Equitable Svc. for Participating Private Schools form. Enter the Number of Public School Children from Low-Income Families from All Title Schools in District value. Select Save button. Upon selection of Save, District Total # of Children from Low-Income Families necessary calculations will be performed and automatically populated.
2. Select Set Aside from the Set Aside drop-down. If Set Aside needed is not displayed in the drop-down, select "Other", then enter name of your set aside in the "Other Set Aside" field. Select Add Set Aside. Once Add Set Aside is selected, the name entered in the "Other Set Aside" field will now appear in the Set Aside drop-down. Repeat this step for each additional set aside in your district.
3. Once Set Aside is selected, enter the Reservation Amount.
4. Data must be entered for each private school participating in Title I in your district. Please select the name of the private school by selecting it from the Private School Name drop-down. If Private School needed is not displayed in the drop-down, select "Add Private School", then enter name of the private school in the "Add Private School" field. Select Add School. Once Add School is selected, the name entered in the "Add Private School" field will now appear in the Private School Name drop-down. Repeat this step for each additional Private School not listed in drop-down for your district.
5. Enter the accurate data for Number of Private School Children from Low-Income Families for the selected private school. The remaining fields will be automatically populated and the necessary calculations will be performed.
6. Repeat steps 1 - 5 for each Private School and Set Aside in District.

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### Consolidated Application

# of Public School Children from Low-Income Families from All Title Schools in District:	District # of Private School Children from Low-Income Families:	District Total # of Children from Low-Income Families:
4577	29	4606

Set Aside	Reservation Amount	Amount for Private School Equitable Participation	Con App Set Aside Amount
Parental Involvement	16557	104.00	16453
Professional Development	12552	79.00	12473
<b>Total District Set Aside Amount for Private School Equitable Participation:</b>		183.00	

Set Aside:

Reservation Amount:

Set Aside	Reservation Amount
Parental Involvement	16557
Professional Development	12552

Private School Level

Private School Name:

Add Private School:

Set Aside:

# of Private School Children from Low-Income Families :	# of Public School Children from Low-Income Families from All Title Schools in District	Total # of Children from Low-income Families :	Proportion of Reservation:	Amount for Private School Equitable Participation:
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Private School Name	Set Aside	Private School Children from Low-Income Families	Public School Children from Low-Income Families from All title Schools in District	Total # of Children from Low-Income Families	Proportion of Reservation	Amount for Private School Equitable Participation
Advance Learning	Parental Involvement	29	4577	4606	0.006296	104
Advance Learning	Professional Development	29	4577	4606	0.006296	79
Total Set Aside Amount for Private School Equitable Participation for this School Only						183

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# Title I Program Specialist Contact Information

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# Title I, Part A Program Specialists' Contact Information



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