

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







- 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



Guidance





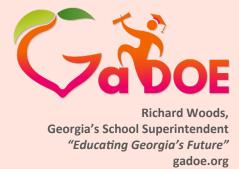
The Elementary and Secondary Education Act of 1965 (ESEA) provides benefits to private school students, teachers and other education personnel, including those in religiously affiliated schools.





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.





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.





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 21st Century Community Districting Centers





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.





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.





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, educationallyrelated, objective criteria for participation eligibility.
- Ensure that poverty is not be used for identification or services. Poverty is used only to determine funding allocation.





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.





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.

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.



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.





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





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 <u>assess academically the services</u> <u>provided</u> and how the district will use the results of that assessment to improve services.

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





Regulatory Requirements for Consultation

- The <u>size and scope</u> 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 <u>will allocate</u> 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.





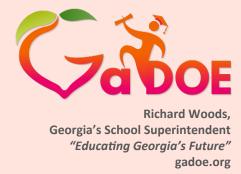
Regulatory Requirements for Consultation

- 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 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.*

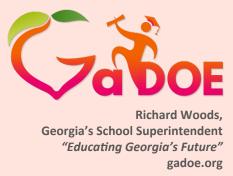




Consultation Steps

- 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.

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.





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





Sample Documentation

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





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.





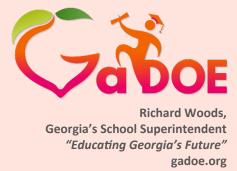
Disagreements and Complaints

- 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





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]

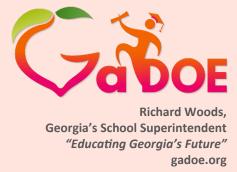




Two options:

- 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).





- 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!



Allocation of Title I Funds

Determining Private School Allocations

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





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.





Calculating Equitable Participation

- Determine the number of private school students from lowincome 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





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

3/24/15





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;

3/24/15





Professional Learning

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

3/24/15





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





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

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.

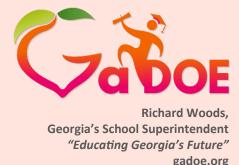
Ensuring Equitable Participation



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;

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





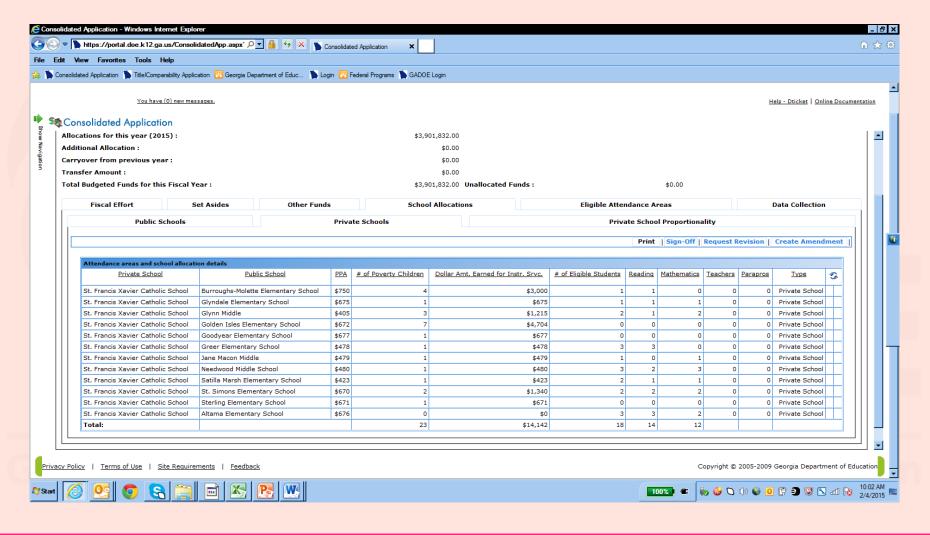
Private School Per Pupil Allocation (PPA) Worksheet:

Embedded in Consolidated Application

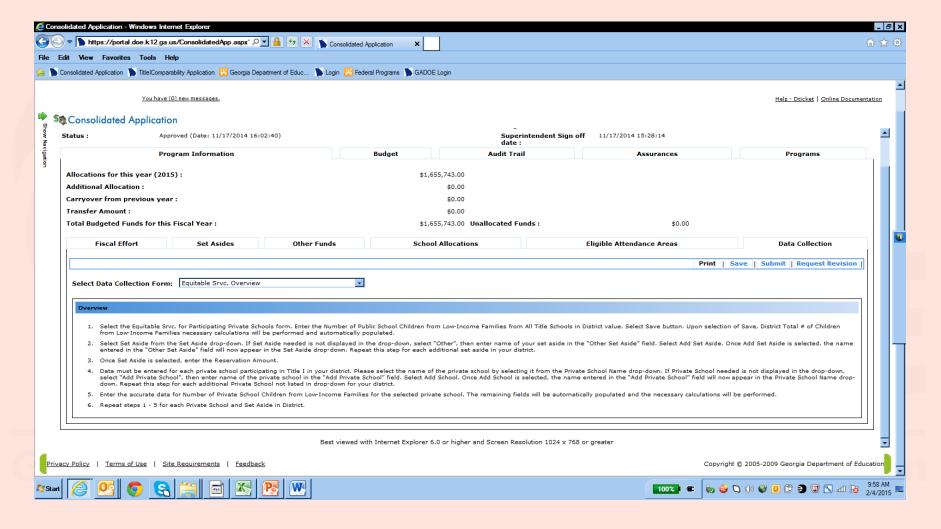
Private School Equitable Participation Worksheet:

Embedded in Consolidated Application

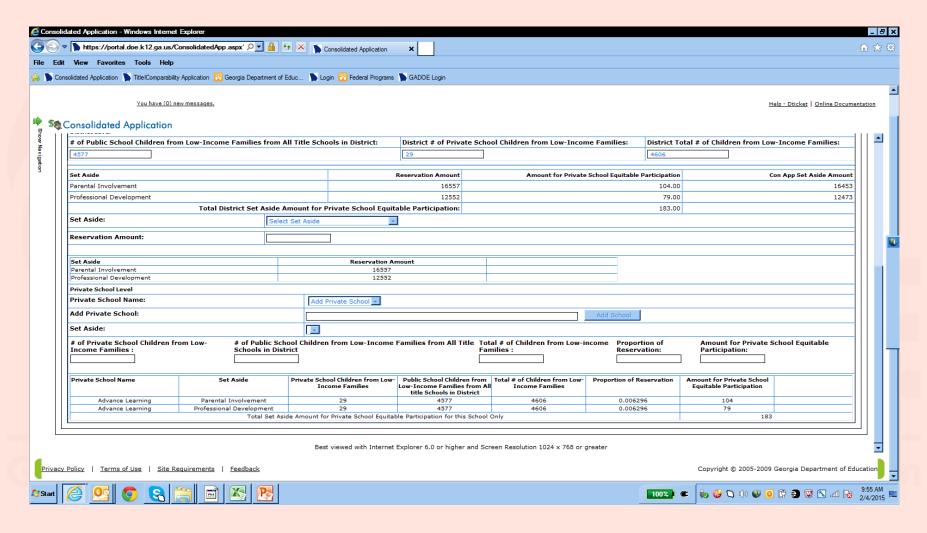














Georgia's School Superintendent
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Title I Program Specialist Contact Information

Title I, Part A Program Specialists' Contact Information



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