Equitable Services Carry Over Policy

Updated December 2021

Public districts should ensure equitable services are provided in the fiscal year for which funds are appropriated so that eligible students, teachers and other educational personnel, and families receive the services to which they are entitled in a timely manner. However, even with the best intentions and with timely and meaningful consultation between the public district and nonpublic school officials, there are occasions when the total equitable service allocation is not obligated in the fiscal year.

For instances in which the public districts and nonpublic schools are unable to obligate the total equitable service allocation in the fiscal year in which funds were awarded as required under the Elementary and Secondary Education Act (ESEA) Section 1117(a)(4)(B) and 8501(a)(4)(B), the public district and nonpublic officials must take the following steps:

1. Engage in Consultation Regarding Carryover: Before June 30 of each year, the public district and nonpublic officials must discuss any potential differences between their annual equitable service allocations and the total amount that is expected to be obligated before September 30. It is important to include district fiscal personnel, as well as district program personnel in this discussion. The Treasurer will be the one to make the carryover request on the Final Expenditure Report. If any of the equitable service allocation amount is not expected to be obligated by September 30, the public district and nonpublic officials will need to explain the reason for the difference in the Consultation Guide within the Nonpublic Data System (NPDS).

2. Agreement between the Public District and Nonpublic School: Prior to submitting the Final Expenditure Report (FER), the district and nonpublic officials discuss if the public district will allow for the remaining equitable service allocation to be carried forward into the next year based on the reasons for the differences in what was allocated and obligated for the current year as noted in the step above. In this step, the public district should ensure it is following the equitable service non-regulatory guidance from the United States Department of Education for Title I, Part A (question B-27) and Uniform Provisions (question F-9).

3. Action Plan in NPDS: If the public district allows for the remaining equitable service allocation to be carried forward into the next year, the public district will be required to complete an Action Plan in the NPDS for review by the nonpublic school to document the circumstances that led to the difference and the proposed action plan for both the public district and nonpublic school as to how to ensure that the funds are expended in the year in which they are generated.

4. ODE Approval and Validation: The Office of Federal Programs and Office of Grants Management will review and approve the request for carryover. After the district has provided the carryover value in the FER, the amount will be added to the existing Nonpublic School Service page in the Comprehensive Continuous Improvement Plan (CCIP) to show the current year calculated value and the carryover amount from the previous fiscal year. A

system validation ensures that all carryover funds are budgeted along with the equitable service allocation for the current year.

Special Note

It is ultimately the public district's responsibility to provide services in the year in which funds are received. As part of ongoing consultation, if a nonpublic school declines Title I services during the school year, the participation status in NPDS must be updated. CCIP will recalculate and redistribute and equitable service amounts generated for a school that declines services. The district must determine if equitable service allocations not obligated in the year in which they were generated should or must be carried forward. If the public district does not permit the funds to be carried forward, the unexpended equitable service allocations will be swept. In other words, the unused equitable service allocation does not remain with the public district. If the public district carries funds forward and the nonpublic school declines services in the new year, contact Chantelle Carter, Nonpublic Ombudsman for guidance. In all cases where carry over is not permitted by the public district, the district should be aware that it may need to justify the reason for not allowing carryover if any nonpublic school files a formal complaint to the Office of Federal Programs or the nonpublic ombudsman. In the event a district exceeds the 15% carryover limitation, and the district receives a reduction in allocation, the reduction may not come from the portion of funds used to provide equitable services.

Policy Benefits

- This process provides transparency for the circumstances surrounding the reason(s) that the amounts were not obligated.
- This process requires an Action Plan and appropriate responses and agreements between all parties to ensure that funds are spent in the year in which they are generated.
- This process is intended to assist with improving consultation/communication between public districts and nonpublic schools.

Addendum

Final Expenditure Report (FER)

There is a page on the FER to report equitable services expenditures at the nonpublic school level for all grants for which the public district has a calculated equitable service allocation. The information that will be collected on this page includes:

District is opting to pool Title I nonpublic service amounts?: Yes ☐ Program office preapproval is required before checking this box.

Nonpublic School IRN	Nonpublic School Name	Grant Name	Service Amount	Incoming Carryover Amount	Nonpublic Expenditure Amount	Outgoing Carryover Amount
000000	Nonpublic School One	Title I-A Improving Basic Programs	$27,172.72	$8,814.54	$31,503.42	$4,483.84
111111	Nonpublic School Two	Title I-A Improving Basic Programs	$66,159.66	$12,759.90	$71,610.15	$7,309.41
222222	Nonpublic School Three	Title I-A Improving Basic Programs	$139,407.85	$5,742.94	$127,563.88	$17,586.91
333333	Nonpublic School Four	Title I-A Improving Basic Programs	$79,155.31	$0.00	$74,760.12	$4,395.19

Repeat for all ESEA Grants that have calculated equitable service amounts (i.e. Title II-A, III and Title IV-A)

*The Service Amount and Incoming Carryover Amount columns are prepopulated from the CCIP. The Nonpublic Expenditure Amount and Outgoing Carryover Amount columns are required to be completed by the district.

CCIP Title I Nonpublic School Services Page

[Download Nonpublic Data]

In-district Participation Statuses:

IRN	Nonpublic School Name	Workflow Status	Participation Status	Are Services Being Provided?	Consultation Guide Status	Nonpublic Service Amount	Nonpublic Service Incoming Carryover Amount	Nonpublic Service Total
000000	Nonpublic School One	Public Approved	Participate	Yes ◉ No ○	Completed	$28,001.39	$4,483.84	$32,485.23
111111	Nonpublic School Two	Public Approved	Participate	Yes ◉ No ○	Completed	$68,323.38	$7,309.41	$75,632.79
222222	Nonpublic School Three	ublic Approved	Participate	Yes ◉ No ○	Completed	$99,684.93	$17,586.91	$117,271.84

*All columns will be prepopulated from the CCIP.

Resources:
Elementary and Secondary Education Act
Title I, Part A Equitable Services Non-Regulatory Guidance
Title IX, Part E Uniform Provisions, Equitable Services Nonregulatory Guidance

If you have questions, please contact Chantelle Carter, Nonpublic Ombudsman, at chantelle.carter@education.ohio.gov.