Equitable Services to Nonpublic Schools



Chantelle Carter
Nonpublic Ombudsman · November 2019

Today's Agenda

- Brief Overview of NPDS Reporting
- Title I
- Title IIA
- Title III and Title IVA

Nonpublic Ombudsman as Authorized by ESSA

- Distribute “Ombudsman Procedures for Ensuring Equitable Services”

  CCIP Note #403 November 2018

Nonpublic Data System

- FY20 reporting window was year 4 for the system
- Reporting occurs from February to May
- October count date

Nonpublic Data System

- Nonpublic officials have the responsibility to begin the process in a timely manner
- Public district officials have responsibility to verify counts before marking *Public Approved*
- Public district officials have obligation to consult annually

Log in to the Nonpublic Data System



- Overview of Search functionality/tabs
- Nonpublic Equitable Services Report
- Consultation Guides

Questions about the Nonpublic Data System?



Nonpublic Expenditure Reporting and Carryover

Nonpublic School Final Expenditures

Akron City (043489) - Summit County - 2019 - Consolidated - Rev 7 - Final Expenditure Report

Go To

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
052639	Archbishop Hoban	Title I-A Improving Basic Programs	$27,172.72	$8,814.54	$31,503.42	$4,483.84
113050	Arlington Christian Academy	Title I-A Improving Basic Programs	$66,159.66	$12,759.90	$71,610.15	$7,309.41
120865	Emmanuel Christian Academy	Title I-A Improving Basic Programs	$139,407.85	$5,742.94	$127,563.88	$17,586.91
054171	Mayfair Christian School	Title I-A Improving Basic Programs	$79,155.31	$0.00	$74,760.12	$4,395.19
056937	Our Lady Of The Elms	Title I-A Improving Basic Programs	$15,358.49	$2,391.26	$15,566.87	$2,182.88
056994	St Anthony Of Padua	Title I-A Improving Basic Programs	$108,690.87	$3,505.74	$105,037.22	$7,159.39
057182	St Augustine	Title I-A Improving Basic Programs	$64,978.24	$7,878.29	$57,713.91	$15,142.62

CONSULTATION

- Needs of Private School Students and Teachers
- How & When Decisions are Made
- Amount of Funds Available for Services and How the Amount Is Determined
- How, where, when and by whom services are provided
- Pooling of Funds
- Size and Scope of Services
- Providing Services Directly or Via Another Entity

Documentation of Consultation Required

Timely and meaningful consultation must continue **throughout** the implementation and assessment of services and shall occur **before** the local education agency makes **any** decision that affects the opportunities to participate of eligible private school students, teachers, and other education personnel.



January → February → March → April → May → June → July → August → September → October → November → December → January

- Use of 3rd Party Provider and Written Explanation for Not Using 3rd Party Provider
- Assessment of Services
- Title I , Part A – Additional Topics: Method for Determining Number of Low-Income Students; Consolidation and Coordination of Title Funds for Services; Results of Consultation Agreement Must Be Transmitted to Ombudsman; Written Explanation for Disagreements

Title I:
Improving Basic Programs

- Funds are generated by low income counts reported to a Title I served public attendance area

- Services may be provided to ANY child who resides in the Title I served public attendance area (not limited to low income children).

Title I:
Improving Basic Programs

- Targeted Assistance Model
  - –Must have multiple, objective criterion
  - –Must be aggregated for total score
  - –Children must be rank ordered
  - –Children selected for service based on that rank order

Title I:
Improving Basic Programs

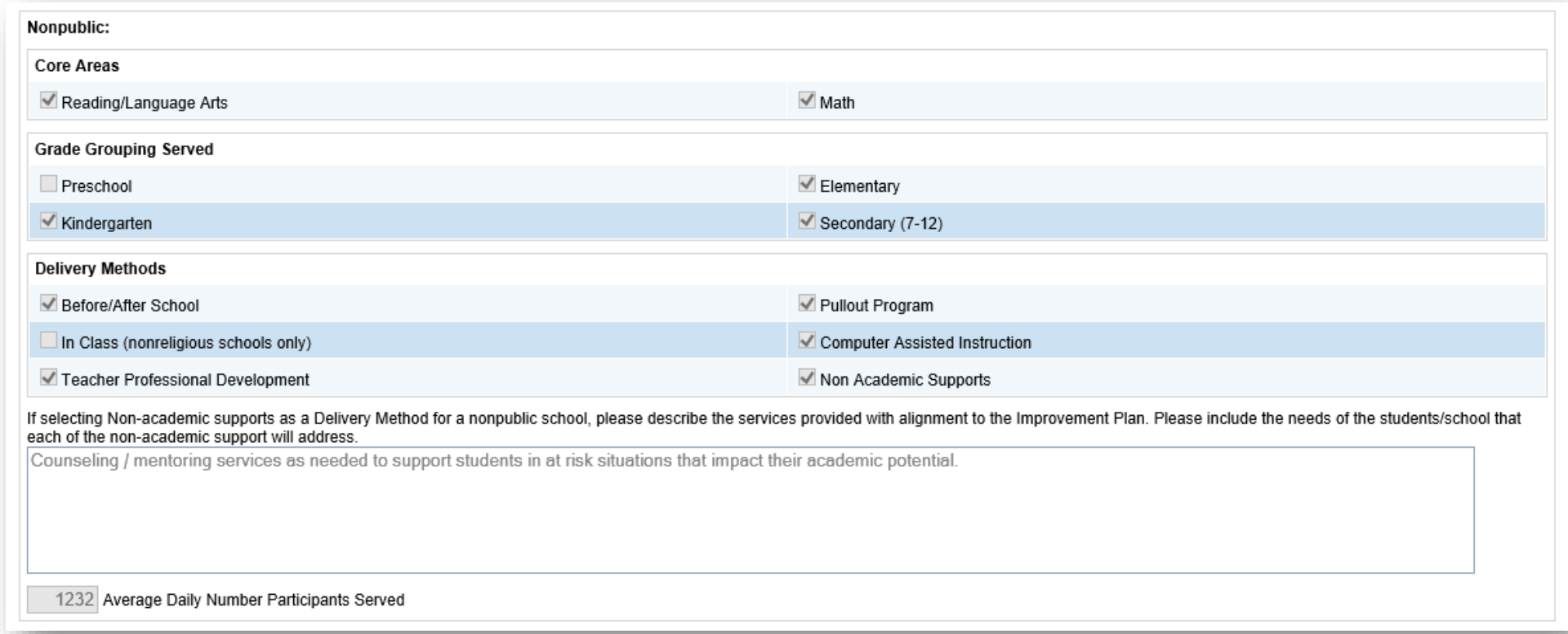
How can services be provided? Primary intent is direct instruction to children

- District hired teacher/tutor
- Memorandum of Understanding with another school district
- Third party contractor

Title I Program Design

- What are the needs of our children?
- How much is our service amount?
- What services can be put into place to best meet those needs?
- Remember, the primary intent and purpose of Title I is to improve the academic achievement of those children most at risk of not meeting the state's academic content standards.

Title I Program Design



Nonpublic:

Core Areas

☑ Reading/Language Arts	☑ Math

Grade Grouping Served

☐ Preschool	☑ Elementary
☑ Kindergarten	☑ Secondary (7-12)

Delivery Methods

☑ Before/After School	☑ Pullout Program
☐ In Class (nonreligious schools only)	☑ Computer Assisted Instruction
☑ Teacher Professional Development	☑ Non Academic Supports

If selecting Non-academic supports as a Delivery Method for a nonpublic school, please describe the services provided with alignment to the Improvement Plan. Please include the needs of the students/school that each of the non-academic support will address.

Counseling / mentoring services as needed to support students in at risk situations that impact their academic potential.

1232 Average Daily Number Participants Served

A program may not consist entirely of supplies.

Title I Expanded Uses of Funds

Even with non-academic supports, the program must be a Targeted Assistance model and there must be an objective process to determine and document which children will receive services.

- Counseling
- Mentoring
- Behavior Supports

Title I:
Improving Basic Programs

NO comingling of funds

- Not with auxiliary

- Not between districts (this requires accurate record keeping). **Unless you have an MOU that indicates pooling across LEA's**

Title I Compliance

The district is responsible for meeting compliance.

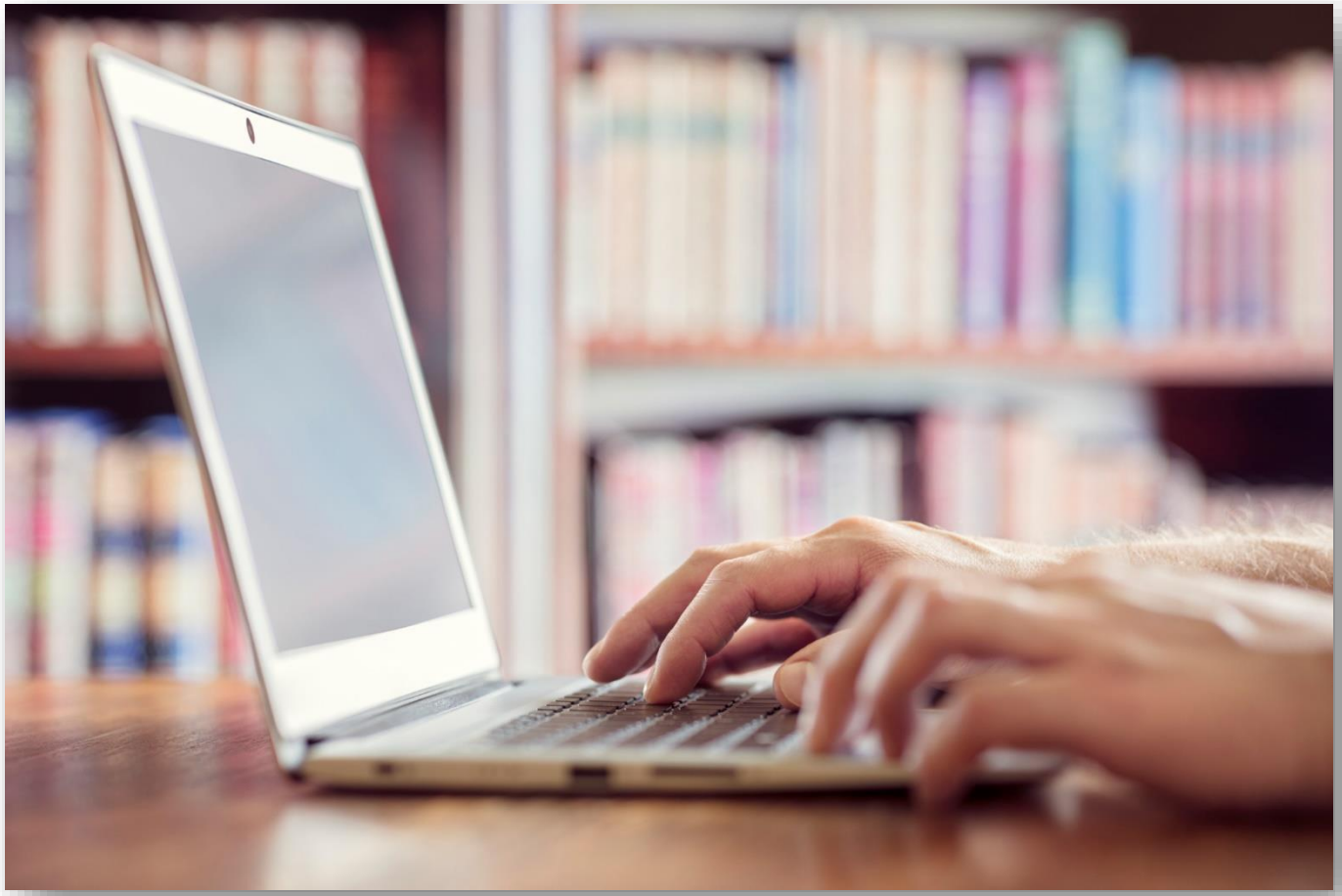
- Multi-Criterion Forms
- Rank order lists
- Teacher Schedules
- School Parent Compact

Necessary documentation:

Evidence of Parent engagement activities

Program evaluation
Fiscal records

Title I Updated Guidance



Questions about Title I?



Title II-A: Allowable Uses of Funds

Allowable Activities - (Check at least one of the following)		
P=Public, NP=Nonpublic		
☐ P		Reduce class size to a level that is evidence-based to improve student achievement through the recruiting and hiring of additional effective teachers.
☑ P	☑ NP	Providing high-quality, personalized, sustained and job embedded professional development that is evidence-based for teachers, instructional leadership teams, principals, or other school leaders focused on improving teaching.
☑ P	☑ NP	Developing programs and activities that increase the ability of teachers to effectively teach children with disabilities, including children with significant cognitive disabilities, and English learners, which may include the use of multi-tier systems of support and positive behavioral intervention and supports, so that such children with disabilities and English learners can meet the challenging State academic standards.
☑ P	☑ NP	Providing programs and activities to increase the knowledge of teachers, paraprofessionals, principals or other school leaders on early literacy instruction, preschool programs and meeting the needs of students through age 8.
☑ P	☑ NP	Providing joint professional learning and planning activities for school staff and educators in preschool programs that address the transition to elementary school.
☐ P	☐ NP	Providing training to support the identification of gifted and talented students, including high-ability students not formally identified for gifted education services, and implementing instructional practices that support the education of such students.
☑ P	☑ NP	Providing training, TA and capacity-building in LEAs to assist teachers, principals or other school leaders with selecting and implementing formative assessments, designing classroom-based assessments and using such data to improve instruction and student academic achievement, which may include providing additional time for teachers to review student data.
☑ P	☑ NP	Providing high-quality professional development for teachers, principals, or other school leaders on effective strategies to integrate rigorous academic content, transition to post-secondary education, career and technical education and work-based learning.
☑ P	☑ NP	Carrying out in-service training for school personnel in the techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness; the use of referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community, where appropriate; forming partnerships between school-based mental health programs and public or private mental health organizations; and addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism.
☐ P	☑ NP	Supporting the instructional services provided by effective school library programs.
☐ P	☑ NP	Providing training for all school personnel regarding how to prevent and recognize child sexual abuse.
☑ P	☑ NP	Carrying out other activities using evidence-based professional learning models to the extent the state determines that such evidence is reasonably available.
☐ P	☐ NP	Develop or improve a rigorous, transparent and fair evaluation and support system for teacher, principals or other school leaders.
☑ P	☐ NP	Initiatives to recruit, hire and retain effective teachers and principals within schools with a high percentage of ineffective teachers.
☑ P	☐ NP	Recruitment and retention of qualified individuals from other fields to become teachers, principals or other school leaders.
☐ P	☐ NP	Developing and providing comprehensive systems of support to help train, recruit and retain teachers, in the fields of science, technology, engineering and mathematics, including computer science.
☑ P	☑ NP	Providing HQPD to effectively engage parents, families and community partners and coordinate services between school and community.
☐ P	☐ NP	Developing feedback mechanisms to improve school working conditions, including periodically and publicly reporting results of educator support and working conditions.

Title II-A Process

Think systemically about a professional development plan for your school



Title II-A Process

- If district board policy prohibits out of state travel – the same prohibition would extend to nonpublic

- Any service that is denied must have a written justification

Title II-A Question to the U.S. Department of Education

Question: May Title II, Part A funds be used to pay for a private school teacher's attendance at a professional conference?

Answer: *In order to be an allowable activity under Title II, including for private school participants, attendance at a professional conference must meet certain requirements.*

Title II-A Question to ED

1. The activity must be an allowable Title II activity and meet the definition of professional development where applicable (ESEA sections 2103(b)(3) and 8101(42)).

Title II-A Question to ED

2. The activity must serve to meet the needs of the private school teacher(s) as identified through the consultation process (ESEA section 8501(c)).

Title II-A Question to ED

3. The activity must be supplemental in nature, and may not supplant the professional development that the private school would otherwise provide absent the Title II, Part A services (34 CFR § 299.8(a)).

Title II-A Question to ED

4. The activity must be a reasonable and necessary expense (2 CFR § 200.403(a)).

Title II-A Question to ED

5. The services must be secular, neutral, and nonideological (ESEA section 8501(a)(2)).

Title II-A Question to ED

Professional development services and programs must meet the definition of “professional development” in ESEA section 8101(42), which requires that the activity is both

(1) Part of the strategies for providing educators with the knowledge and skills necessary to enable students to succeed in a well-rounded education; and

(2) “SEustained (not stand-alone, 1-day, or short term workshops), intensive, collaborative, job-embedded, data driven, and classroom focused.”

Title II-A Question to ED

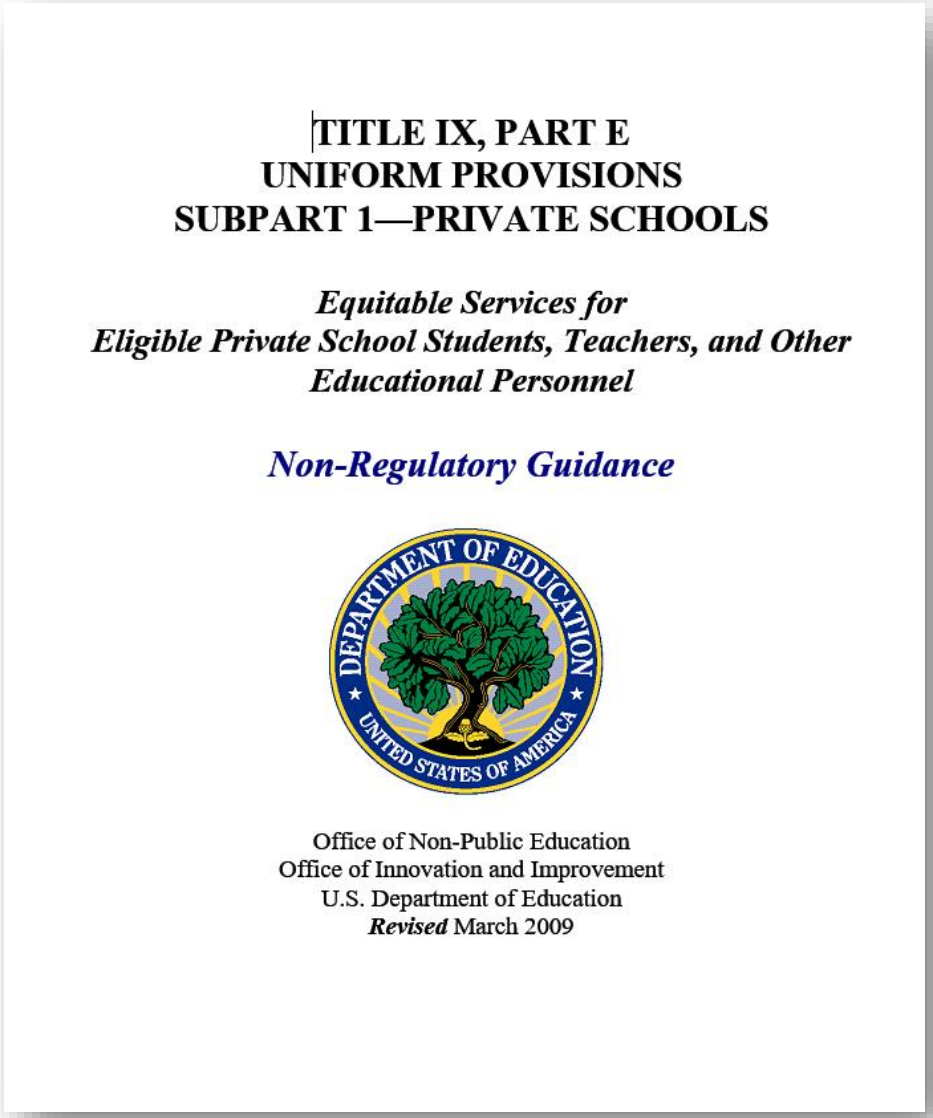
Because many conferences are short-term or are stand-alone, they may not meet this definition as an allowable expenditure under ESEA section 2103(b)(3) without further integration as part of a comprehensive plan for professional development for the teacher or teachers.

Title II-A Compliance

- Evidence of consultation
- Evidence of a needs assessment
- Fiscal records in alignment with allowable activities

Title IX
Non-Regulatory Guidance

- TITLE IX, PART E, UNIFORM PROVISIONS, SUBPART 1—PRIVATE SCHOOLS Equitable Services for Eligible Private School Students, Teachers, and Other Educational Personnel Non-Regulatory Guidance March 2009



Title IX Non-Regulatory Guidance

Questions about Title IIA?



Title III: Language Instruction for English Instruction

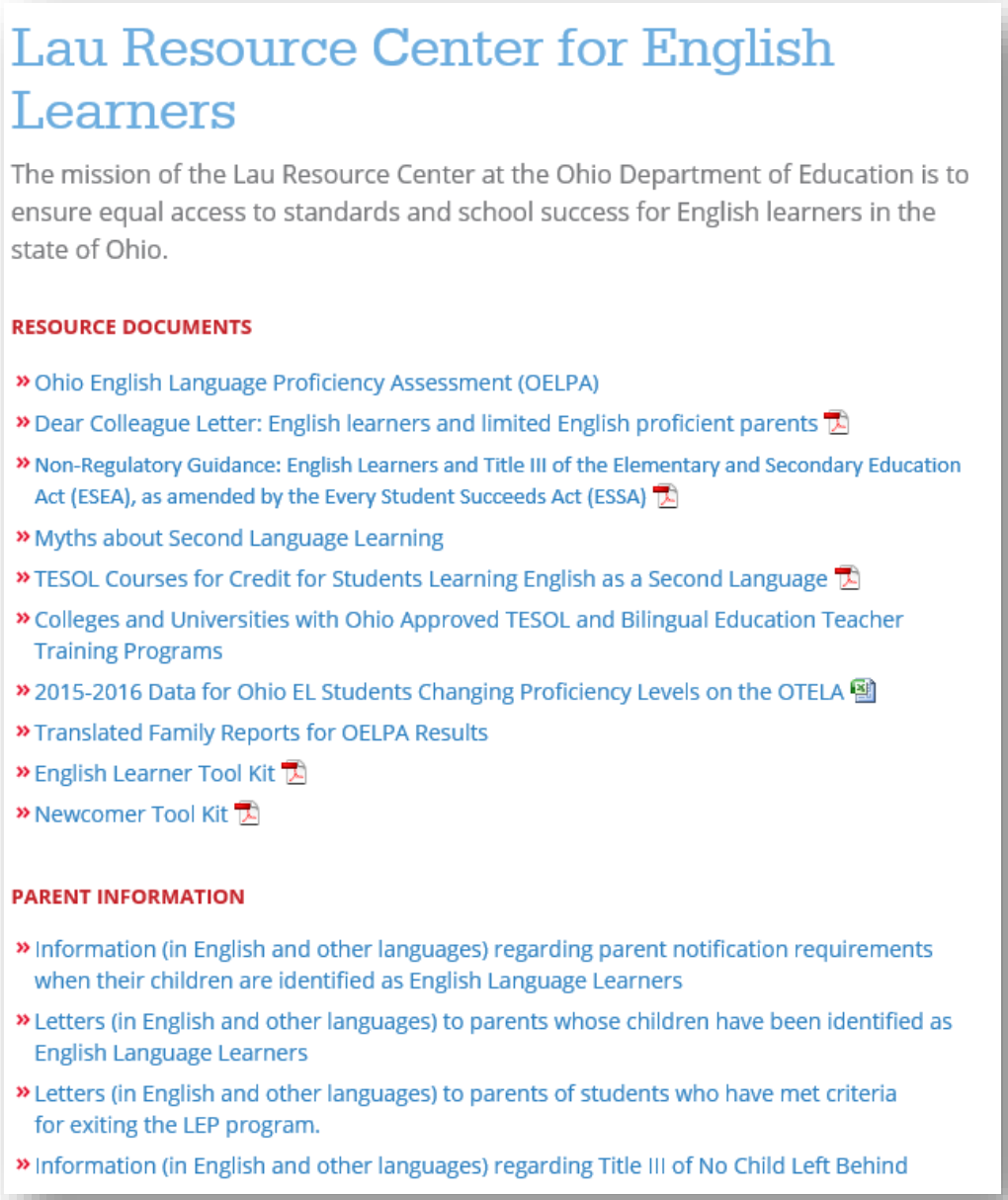
Title III funds may not be used to meet the civil rights obligations a school has to children.

Title III: Language Instruction for English Instruction

Allowable activities include:

- Supplemental education supports
- Parent engagement supports
- Professional development supports to all teachers who have English learners in their classrooms.

The Lau Center at the Ohio Department of Education



Lau Resource Center for English Learners

The mission of the Lau Resource Center at the Ohio Department of Education is to ensure equal access to standards and school success for English learners in the state of Ohio.

RESOURCE DOCUMENTS

- Ohio English Language Proficiency Assessment (OELPA)
- Dear Colleague Letter: English learners and limited English proficient parents
- Non-Regulatory Guidance: English Learners and Title III of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA)
- Myths about Second Language Learning
- TESOL Courses for Credit for Students Learning English as a Second Language
- Colleges and Universities with Ohio Approved TESOL and Bilingual Education Teacher Training Programs
- 2015-2016 Data for Ohio EL Students Changing Proficiency Levels on the OTELA
- Translated Family Reports for OELPA Results
- English Learner Tool Kit
- Newcomer Tool Kit

PARENT INFORMATION

- Information (in English and other languages) regarding parent notification requirements when their children are identified as English Language Learners
- Letters (in English and other languages) to parents whose children have been identified as English Language Learners
- Letters (in English and other languages) to parents of students who have met criteria for exiting the LEP program.
- Information (in English and other languages) regarding Title III of No Child Left Behind

The Lau Center at the Ohio Department of Education

DONNA VILLAREAL

Lau Resource Center for English Learners
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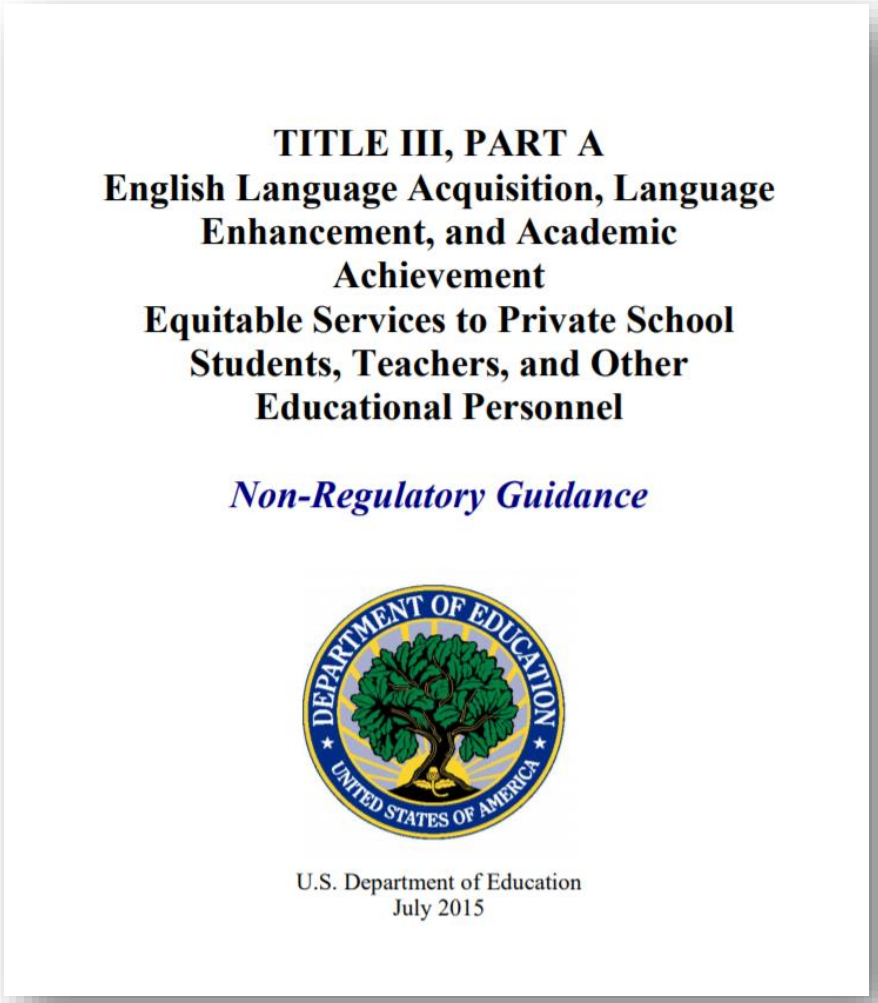
MATTHEW IMPERATO

Office of Integrated Student Supports
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matthew.imperato@education.ohio.gov

LAU RESOURCE CENTER

614-466-4109

lau@education.ohio.gov



Title III: Language Instruction for English Instruction Non-Regulatory Guidance

Title III Compliance

- Evidence of consultation
- Evidence of a district process to identify English Learners in the nonpublic setting
- Compliance to supplement not supplant provision
- Fiscal records in alignment with allowable activities

Questions about Title III?



Title IV-A: Student Support and Academic Enrichment

There must be a comprehensive needs assessment that may include:

- Achievement data
- School climate data
- Discipline data
- Attendance data

Title IV-A: Student Support and Academic Enrichment

- Following the comprehensive needs assessment and in consultation with the public district, a program is designed.
- How can we best meet the needs of our children with these funds?
- How are we going to evaluate the results of this program?

Title IV-A
Allowable Uses of Funds

I. Activities to support a Well-rounded Education Opportunities (Sec. 4107)		
P= Public, NP= Nonpublic		
☑ P	☑ NP	a. College and career counseling programs and services
☑ P	☑ NP	b. Improving access to arts and music education
☑ P	☑ NP	c. Improving instruction in STEM subjects/activities
☑ P	☑ NP	d. Promoting access to accelerated learning opportunities (AP-Advanced Placement, IB-International Baccalaureate, Dual or Concurrent Enrollment Programs, Early College High Schools, and other accelerated learning options)
☑ P	☑ NP	e. Activities to promote the development and implementation of programs to teach traditional American history, civics, economics, geography, or government education.
☐ P	☐ NP	f. High school redesign with dual or concurrent enrollment and early college high schools
☑ P	☑ NP	g. Social emotional learning interventions and other social and behavioral skills
☑ P	☑ NP	h. Improving access to foreign language instruction
☑ P	☑ NP	i. Strengthening instruction in environmental education
☐ P	☐ NP	j. Volunteerism and community involvement
☑ P	☑ NP	k. Programs and activities that integrate multiple disciplines, e.g., that combine arts and mathematics
☑ P	☑ NP	l. Other activities and programs to support student access to, and success in, a variety of well-rounded education experiences.

Title IV-A Allowable Uses of Funds

II. Activities to Support Safe and Healthy Students (Sec. 4108)

Safe and Supportive Schools

☑ P	☑ NP	a. Preventing bullying and harassment
☑ P	☑ NP	b. Relationship-building skills
☑ P	☑ NP	c. School dropout prevention
☐ P	☐ NP	d. Re-entry programs and transition services for justice-involved youth
☑ P	☑ NP	e. School readiness and academic success
☑ P	☑ NP	f. Child sexual abuse awareness and prevention
☑ P	☑ NP	g. Reducing use of exclusionary discipline practices and promoting supportive school discipline
☑ P	☑ NP	h. Suicide prevention
☑ P	☑ NP	i. Violence prevention, crisis management and conflict resolution
☑ P	☑ NP	j. Preventing human trafficking
☑ P	☑ NP	k. Building school and community relationships
☑ P	☑ NP	l. Culturally-responsive teaching and professional development of implicit bias
☑ P	☑ NP	m. Professional development and training for school staff
☑ P	☑ NP	n. Other program or activity that fosters safe, healthy and training for school staff

Title IV-A Allowable Uses of Funds

Student Physical and Mental Health

☑ P	☑ NP	o. Drug and violence prevention
☑ P	☑ NP	p. Health and safety practices in school or athletic programs
☐ P	☐ NP	q. School-based health and mental health services
☑ P	☑ NP	r. Healthy, active lifestyle, nutritional education
☑ P	☑ NP	s. Physical activities
☑ P	☑ NP	t. Trauma-informed classroom management
☑ P	☑ NP	u. Preventing use of alcohol, tobacco, marijuana, smokeless tobacco, electronic cigarettes
☐ P	☐ NP	v. Chronic disease management
☑ P	☑ NP	w. Professional development and training for school staff
☑ P	☑ NP	x. Other program or activity that fosters safe, healthy and training for school staff

Cross Cutting Authorized Activities

☑ P	☑ NP	y. Mentoring and school counseling
☑ P	☑ NP	z. Schoolwide Positive Behavioral Interventions
☐ P	☐ NP	aa. Pay-for-Success initiatives aligned with the purposes of Title IV

Title IV-A Allowable Uses of Funds

III. Activities to Support the Effective Use of Technology (Sec. 4109)

SPECIAL RULE: A local educational agency, or consortium of such agencies, shall not use more than 15 percent of funds for purchasing technology infrastructure as described in subsection (a)(2)(B), which shall include technology infrastructure purchased for the activities under subsection (a)(4)(A).

☐ P	☑ NP	a. Purchase of educational technology infrastructure, including devices, equipment, and software applications to address readiness shortfalls; carrying out blended learning projects which may include development of new instructional models (including blended learning technology software and platforms), the purchase of digital instructional resources, initial professional development activities, and one-time information technology purchases (maximum of 15% of Title IV-A allocation). May not include expenditures related to significant construction or renovation facilities.
☐ P	☑ NP	b. Ongoing professional development (at least 85% of funds used under section 4109 may be used to support a variety of sustained professional development) activities for teachers, principals, other school leaders or involved personnel in the effective use of educational technology
☐ P	☐ NP	c. Providing students in rural, remote, and underserved areas with the resources to take advantage of high-quality digital learning experiences, digital resources, and access to online courses taught by effective educators
☐ P	☑ NP	d. Personalized learning to optimize instructional approaches
☐ P	☑ NP	e. Open licensed education resources (e.g., digital learning, online courses)
☐ P	☑ NP	f. Implementing blended learning strategies
☐ P	☑ NP	g. Implement school and district-wide approaches to inform instruction, support teacher collaboration, and personalize learning (e.g., personalized or job-embedded professional development)



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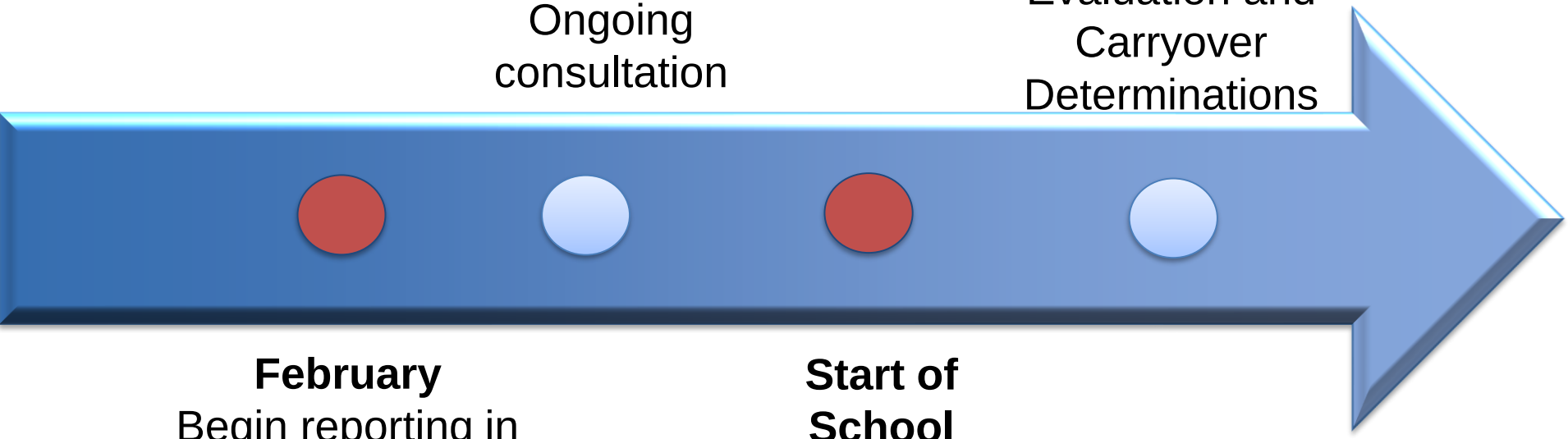
Title IV-A Compliance

- Evidence of consultation
- Evidence of a needs assessment
- Fiscal records in alignment with allowable activities

Questions about Title IV-A?



Equitable Services Timeline



21st Century Competitive Grant



21st Century Competitive Grant

Ohio Department of Education – SEARCH 21st Century

FY20 Continuation Grants
$36,644,838.30

FY20 New Grants $6,667,800.00

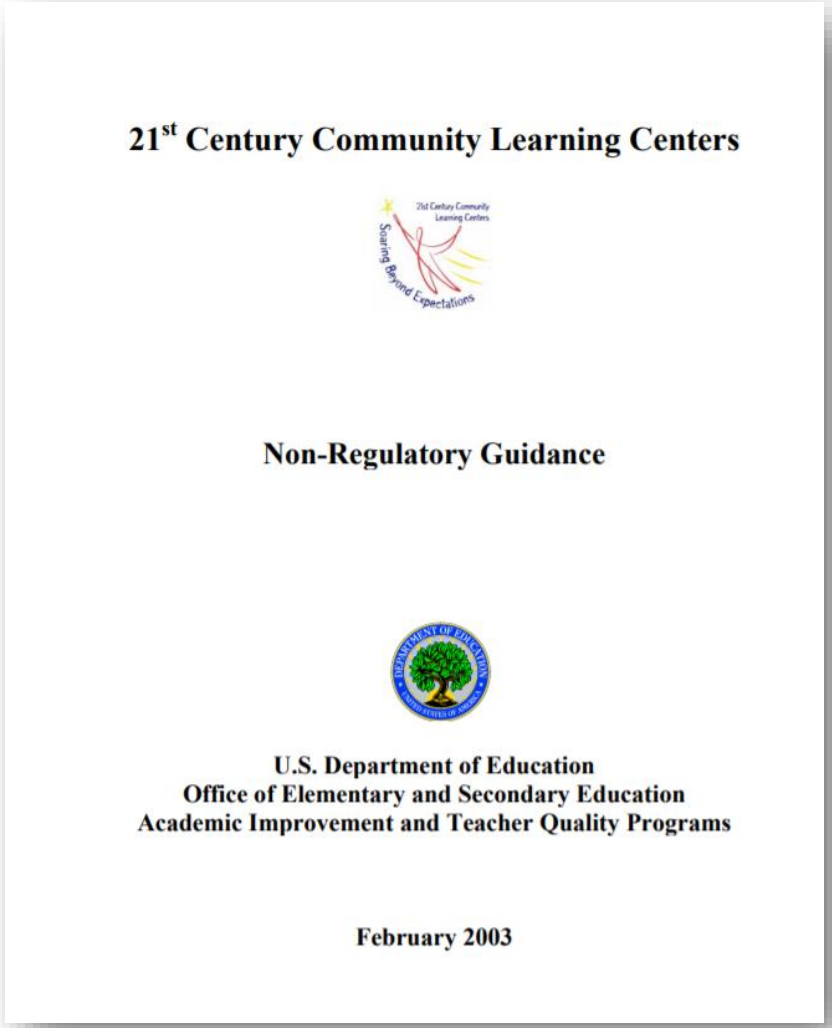
21st Century Competitive Grant

F-16: Are private school students eligible to participate in 21st CCLC activities carried out in public schools?

Yes. Students, teachers, and other educational personnel are eligible to participate in 21st CCLC programs on an equitable basis. A public school or other public or private organization that is awarded a grant must provide equitable services to private school students, and their families. In designing a program that meets this requirement, grantees must provide comparable opportunities for the participation of both public- and private-school students in the area served by the grant. Grantees must consult with private school officials during the design and development of the 21st CCLC program on issues such as how the children's needs will be identified and what services will be offered. Services and benefits provided to private school students must be secular, neutral, and non-ideological.

21st Century Competitive Grant

21st Century Community Learning Centers Non-Regulatory Guidance February 2003

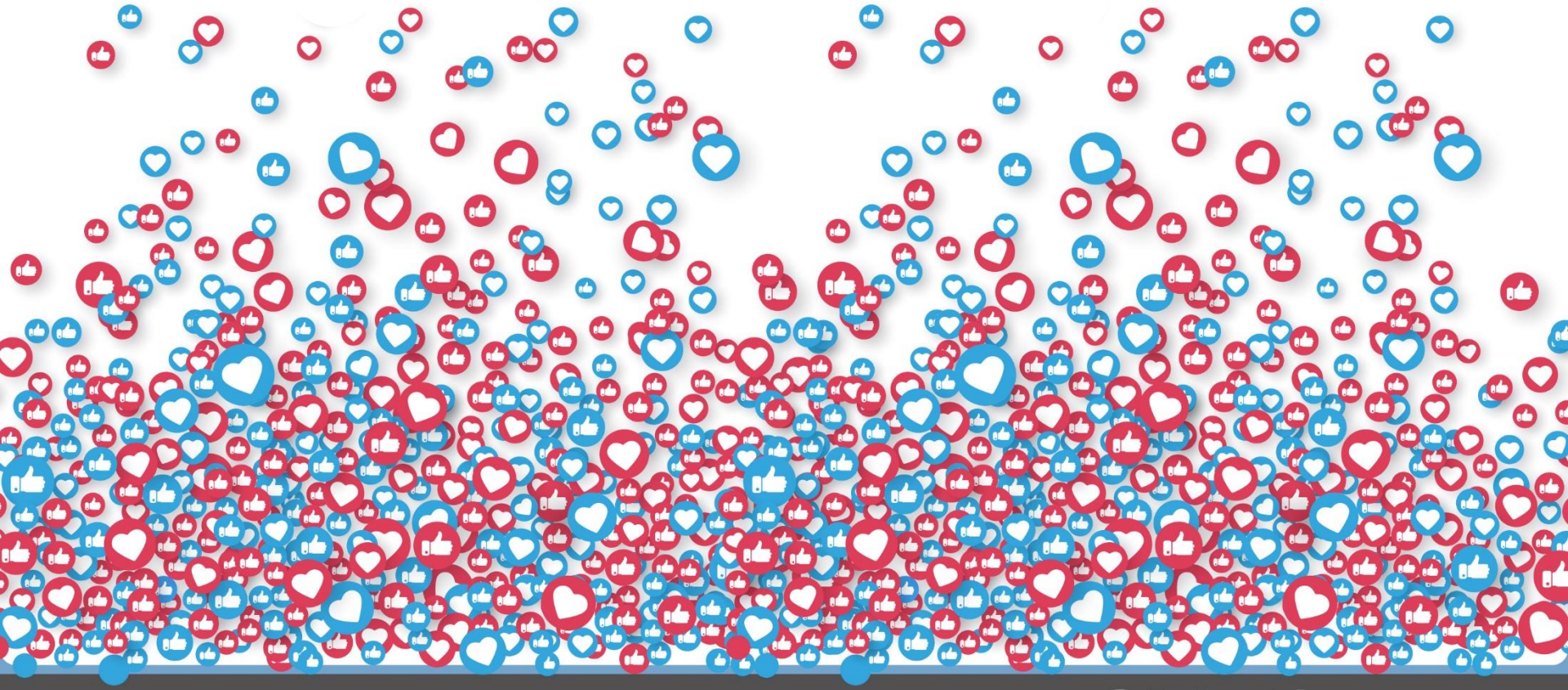


Consolidated Application Scavenger Hunt

Can you find:

- Your home district's FY19 final approved CCIP application?
- The FY19 nonpublic total Title I set aside?
- The FY19 Title IIA per pupil amount?
- The FY19 Title IVA description of nonpublic equitable services?

@OHEducation



Ohio Department of Education

Share your learning community with us!

#MyOhioClassroom





Celebrate educators!

#OhioLovesTeachers