

# Updates to Nonpublic Equitable Services

March 2021

Ohio | Department of Education

# Today's Presenters

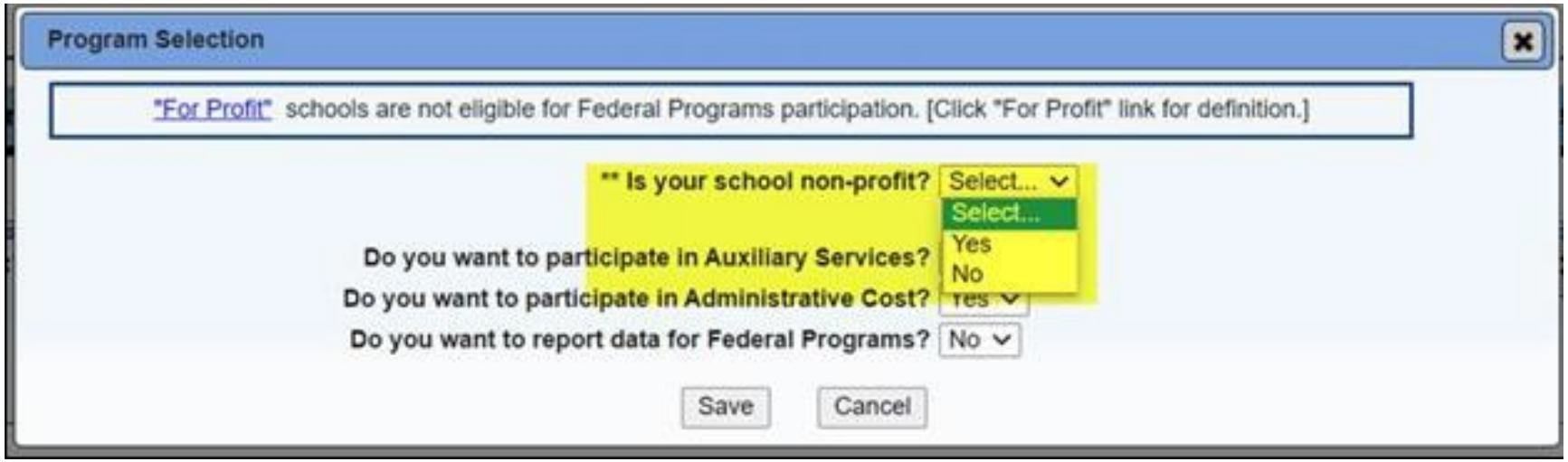
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# Today's Discussion

- NPDS Enhancements
- NPDS Reminders
- Nonchartered Nonpublic Schools
- Title I Equitable Services Guidance
- Compliance Documentation
- Elementary and Secondary Schools Emergency Relief fund (ESSER)
- Emergency Relief to Nonpublic Schools (EANS)
- Questions ?

# NPDS Enhancements



# NPDS Enhancements

**Education Department General Administrative Regulations (EDGAR)**

**Defines Nonprofit Status (Title 34, Subtitle A, Part 75)**

**§75.51 How to prove nonprofit status.**

(a) Under some programs, an applicant must show that it is a nonprofit organization. (See the definition of *nonprofit* in 34 CFR 77.1.)

(b) An applicant may show that it is a nonprofit organization by any of the following means:

(1) Proof that the Internal Revenue Service currently recognizes the applicant as an organization to which contributions are tax deductible under section 501(c)(3) of the Internal Revenue Code;

(2) A statement from a State taxing body or the State attorney general certifying that:

(i) The organization is a nonprofit organization operating within the State; and

(ii) No part of its net earnings may lawfully benefit any private shareholder or individual;

# NPDS Enhancements

## Questions

**Grant : Consultation Guide Question Count : 13**

» Question 1

For Profit schools are not eligible to participate in Federal programs.

ESEA section **8101(19)** and **(45)** defines “elementary school” and “secondary school,” respectively, and specifies that they must be non-profit.

Is this nonpublic school designated as non-profit?

○ **Yes** ○ **No**

# NPDS Reminders

- NPDS opened March 5
- NPDS will close May 7
- CCIP Note # 467 was released

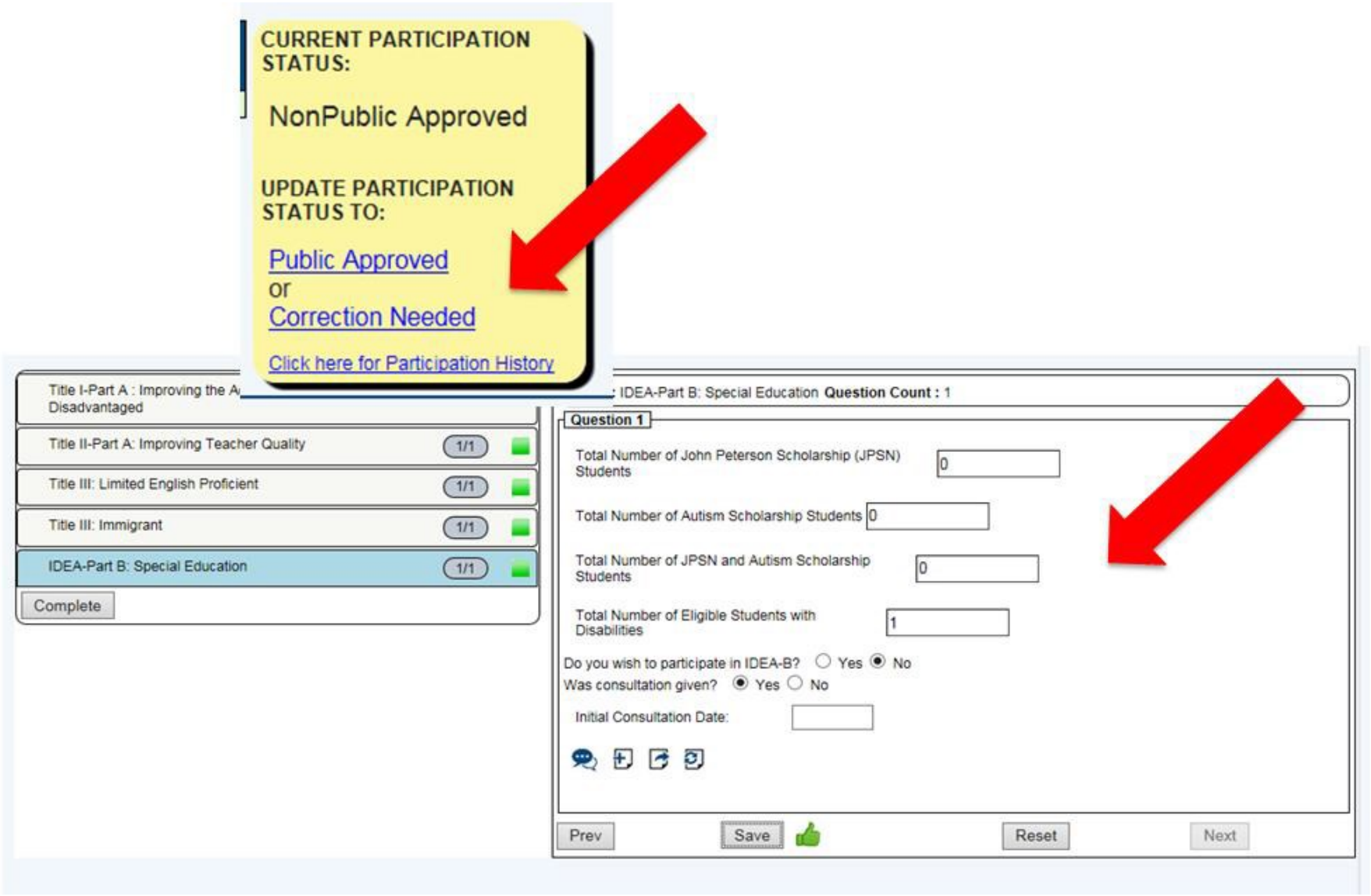
# Title IIA and IVA Calculations

- There will be an adjustment to the calculation for equitable services in Title IIA and IVA when FY22 CCIP is available in June 2021. The calculation currently only includes in-state nonpublic student counts. The adjustment to the calculation will include all children reported by the nonpublic school, regardless of where they reside.

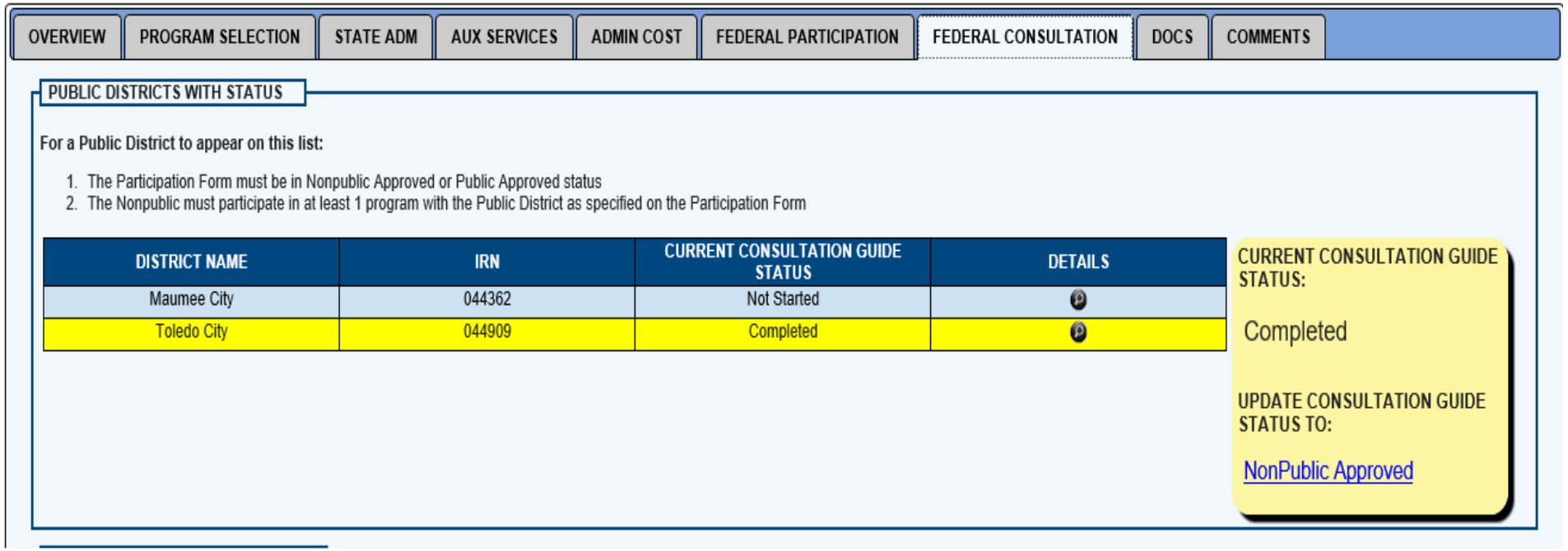
# NPDS Reminders

- How does the COVID pandemic impact low-income reporting?

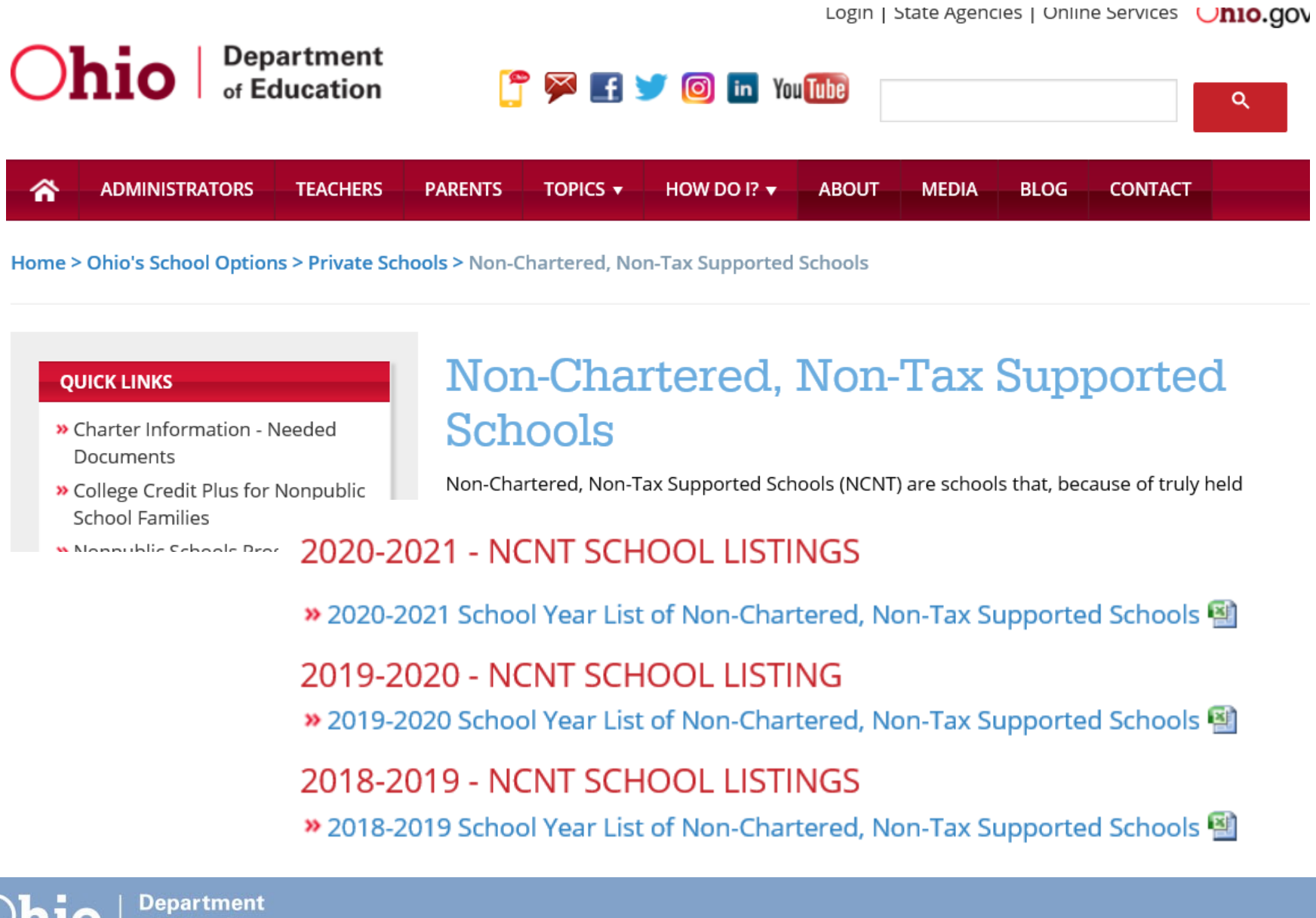
# NPDS Reminders



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# Title I Non-Regulatory Guidance

**Title I, Part A**
**of the Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act:**

**Providing Equitable Services to Eligible Private School Children, Teachers, and Families**

**Updated Non-Regulatory Guidance**

October 7, 2019

https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=83190

# 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**

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

**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.



**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**

# Programmatic Compliance Requirements

- Multi-criterion forms
- Rank order list – we would expect to see children from every district that contributed to the pool
- School parent compact
- Evidence of parent engagement
- Teacher schedules/service lists

# Equitable Services

- Secular
- Non-ideological
- Public maintains control of funds
- May not permanently improve nonpublic school

# Elementary and Secondary School Emergency Relief (ESSER)

- Equitable services ARE required
- Calculations are based on low-income children reported to Title I service areas
- Services must be offered to all schools with low-income children – in and out of the district
- CCIP Note #448 Calculation template should be uploaded to ESSER app

# Elementary and Secondary School Emergency Relief (ESSER)

- Will the proposed use of funds “prevent, prepare for, and respond to coronavirus”?
- Is it an allowable use of funds under CARES/CRRSA?
- Is it reasonable and necessary?
- Does it promote equity?
- Does it support returning students to the classroom?

# Elementary and Secondary School Emergency Relief (ESSER) II

- ESSER II has no equitable service obligation

- Nonpublic schools may participate in the Emergency Assistance to Nonpublic Schools (EANS) Program

# Emergency Assistance to Nonpublic Schools

- From Governor's Emergency Education Relief (GEER) II
- Awarded from the state directly to nonpublic schools
- Services will be provided through regional  Educational Service Centers (ESC)

# American Recovery Plan Act

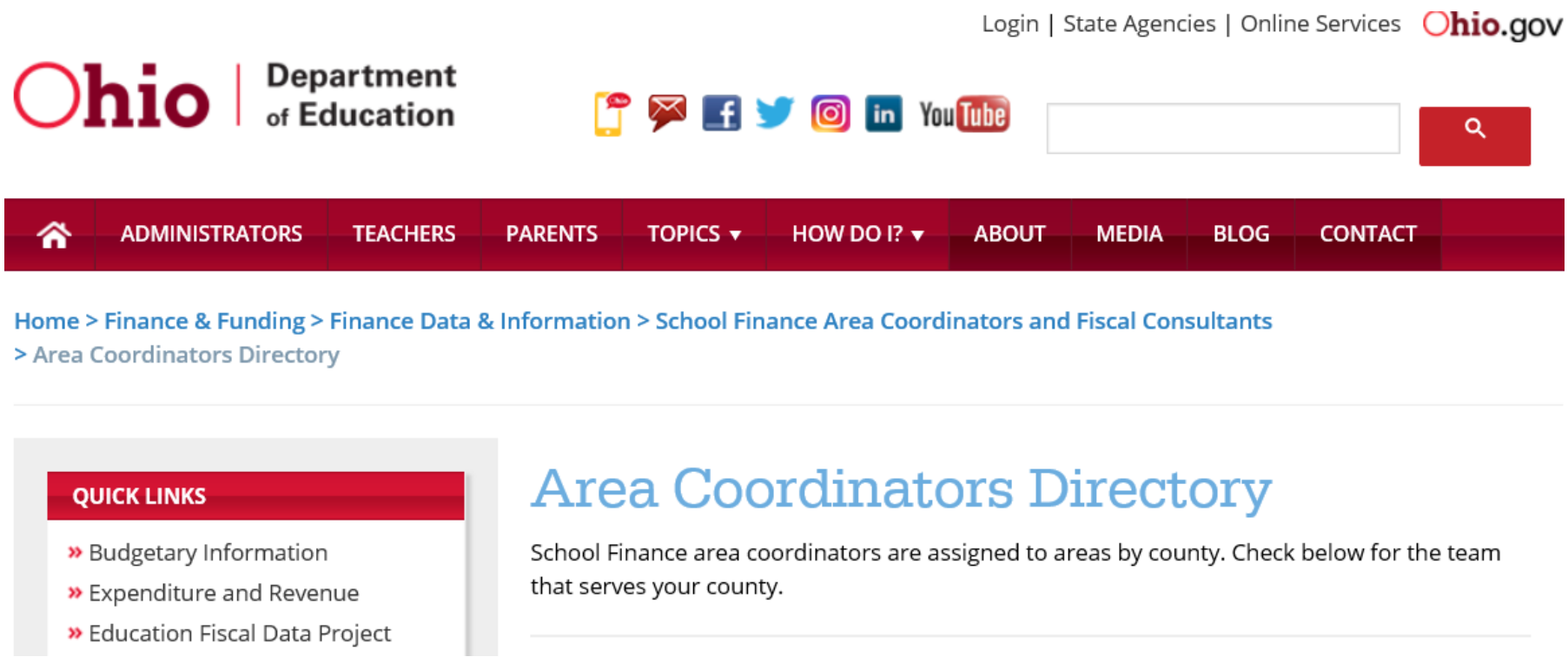
- ESSER III
- Equitable services will be delivered through Emergency Assistance to Nonpublic Schools (EANS) program

# Individuals with Disabilities Education Act (IDEA) Questions

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# Auxiliary Services Questions



# Questions?



# Join the Conversation



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