

Why Do We Provide Equitable Services?

March 2022

Ohio | Department of Education

Today's Presenters

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Today's Discussion

- Title I Equitable Services Guidance
- Chartered Nonpublic Schools
- Nonchartered Nonpublic Schools
- Options for Service Delivery
- Memorandum of Understanding (MOU)
- Compliance Documentation
- Questions ?

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

Title I Equitable Services

- Sec. 1117 of the Elementary and Secondary Education Act (as amended by the Every Student Succeeds Act)
  - "To the extent consistent with the number of eligible children identified under section 1115(c) in the school district served by a local educational agency who are enrolled in private elementary schools and secondary schools" LEAs should provide services "on an equitable basis"

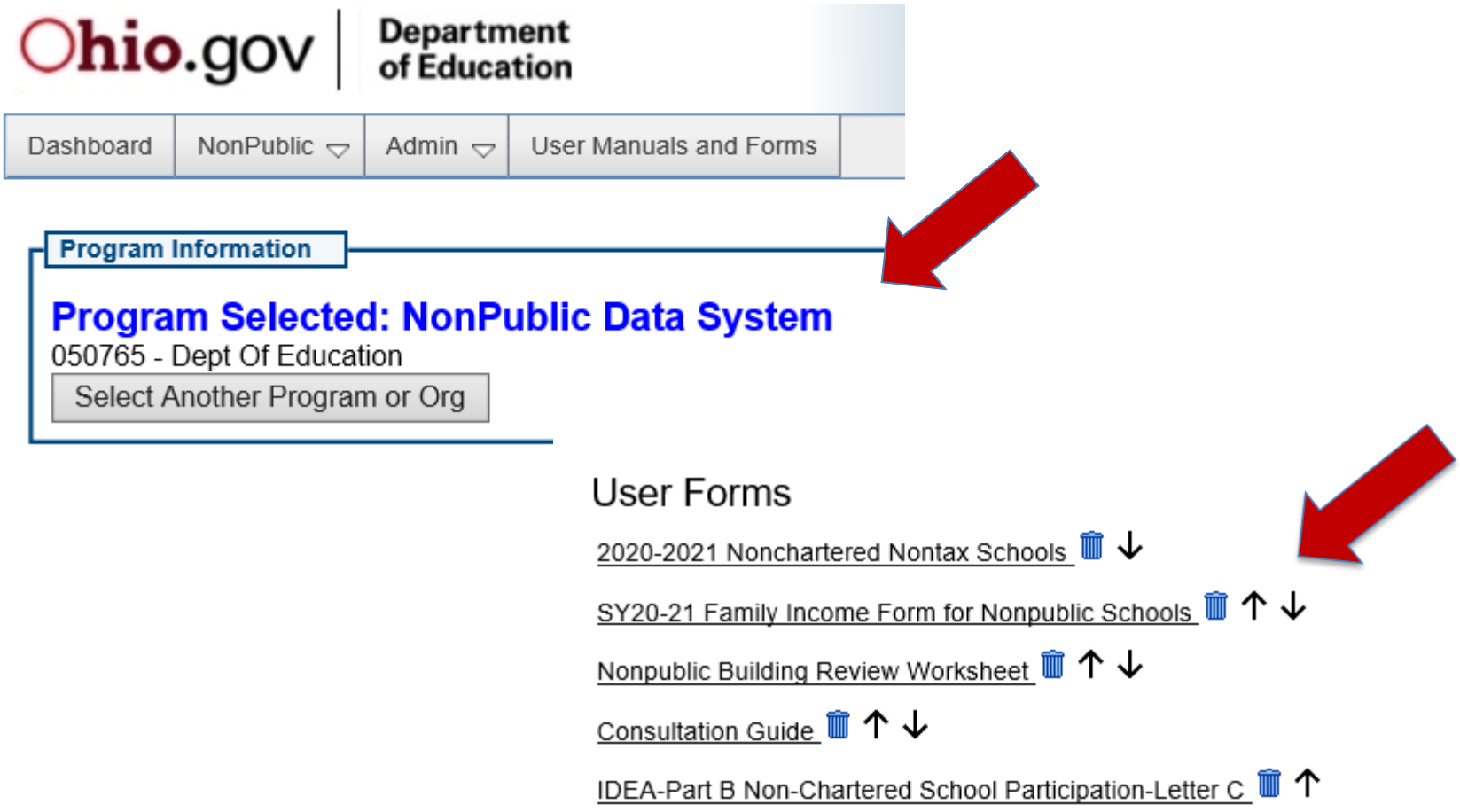
Title I Equitable Services

- Does not matter where the nonpublic school is located
- Must reside in Title I served attendance area
- Must identify low-income students

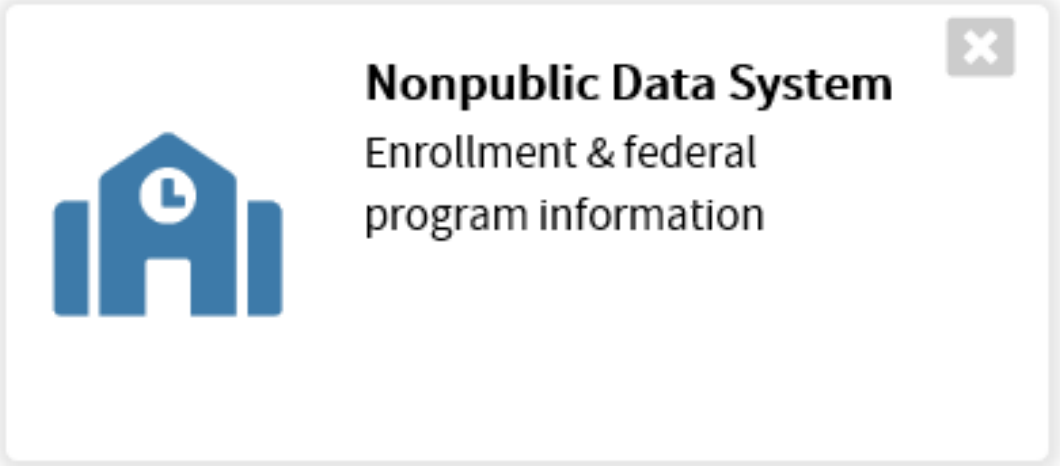
Title I Equitable Services

- National School Lunch Program forms
- Ohio Household Income Verification Form
- The Title I-A Equitable Service Non-Regulatory Guidance (B-11) allows other methods of low-income identification in collaboration with the Local Education Agency.

Title I Equitable Services



Title I Equitable Services





Title I Equitable Services

Set Asides - 100% Rule

Springfield City School District (044818) - Clark County - 2021 - Consolidated - Rev 1 - Title I-A Improving Basic Programs

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Set Asides	Amount
Nonpublic	235,318.42
Nonpublic Parent Engagement (1% of the above Nonpublic amount if the public district award is $500,000 or more)	2353.18

$$\% = \frac{\text{Low Income Children from NP Schools living in Title I served building attendance areas}}{\text{Total NP plus P low income children living in Title I served building attendance areas}}$$

% x Total Title I allocation = NP Set Aside

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School Year 2018-2019
Revised December 2019

District Calculation of Title I A Equitable Service Amounts

Title I Equitable Services

Nonpublic School Service

Springfield City School District (044818) - Clark County - 2021 - Consolidated - Rev 1 - Title I-A Improving Basic Programs

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[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
052829	Catholic Central	Public Approved	Participate	Yes (●) No ( )	Completed	$126,345.46	$10,426.02	$136,771.48
112490	Nightingale Montessori Inc	Public Approved	Participate	Yes (●) No ( )	Completed	$39,482.96	$26,327.50	$65,810.46
070656	Springfield Christian	Public Approved	Participate	Yes (●) No ( )	Completed	$46,589.89	$47,033.22	$93,623.11

Out-of-district Participation Statuses:

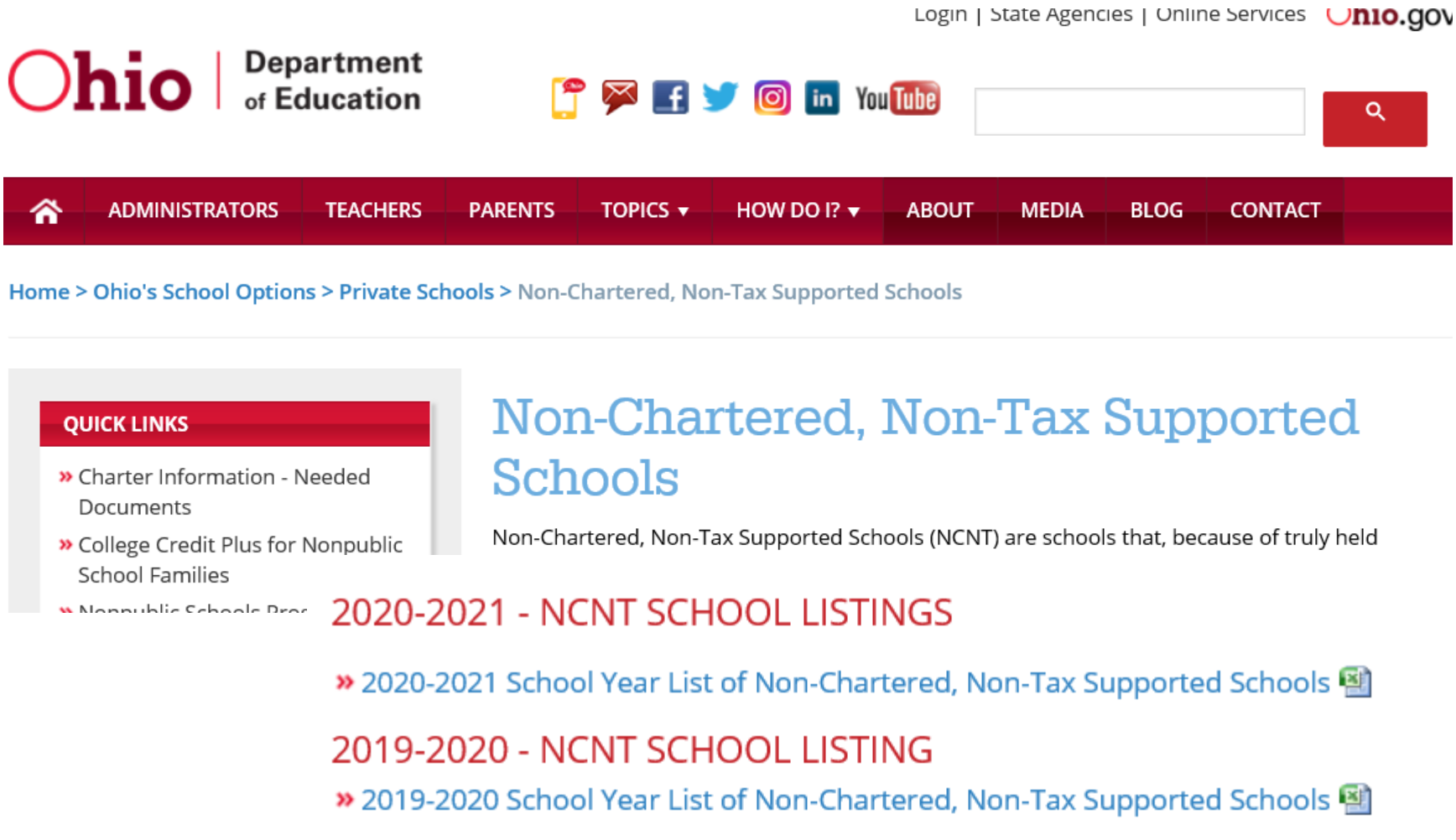
IRN	Nonpublic School Name	Workflow Status	Participation Status	Are Services Being Provided?	Consultation Guide Status	Nonpublic Service Amount	Nonpublic Service Incoming Carryover Amount	Nonpublic Service Total
052803	Carroll	Public Approved	Not Participate		Not Started			
062612	Ridgewood School, The	Public Approved	Participate	Yes (●) No ( )	Completed	$22,900.11	$33,005.77	$55,905.88

Title I Equitable Services



Fiscal	Public I	Public D											uce	Title I-A Allocation
'2021'	44818	Springfie											0	$0.00
'2021'	44818	Springfie											0	$10,265.57
'2021'	44818	Springfie											2	$9,475.91
'2021'	44818	Springfie											1	$9,475.91
'2021'	44818	Springfield City Scho	18895	Kenwood Elementary	SW-Exist	52829	Catholic Central	Yes	$789.66	12	2	$9,475.91
'2021'	44818	Springfield City Scho	19430	Lagonda Elementary School	SW-Exist	52829	Catholic Central	Yes	$789.66	3	0	$2,368.98
'2021'	44818	Springfield City Scho	20792	Lincoln Elementary School	SW-Exist	52829	Catholic Central	Yes	$789.66	17	0	$13,424.20
'2021'	44818	Springfield City Scho	22459	Mann Elementary School	SW-Exist	52829	Catholic Central	Yes	$789.66	16	7	$12,634.55
'2021'	44818	Springfield City Scho	29652	Perrin Woods Elementary Sch	SW-Exist	52829	Catholic Central	Yes	$789.66	16	1	$12,634.55
'2021'	44818	Springfield City Scho	32540	Roosevelt Middle School	SW-Exist	52829	Catholic Central	Yes	$789.66	7	1	$5,527.61
'2021'	44818	Springfield City Scho	33704	Schaefer Middle School	SW-Exist	52829	Catholic Central	Yes	$789.66	7	2	$5,527.61
'2021'	44818	Springfield City Scho	34801	Snowhill Elementary School	SW-Exist	52829	Catholic Central	Yes	$789.66	3	0	$2,368.98
'2021'	44818	Springfield City Scho	34827	Snyder Park Elementary Scho	SW-Exist	52829	Catholic Central	Yes	$789.66	3	0	$2,368.98
'2021'	44818	Springfield City Scho	35527	Springfield High School	SW-Exist	52829	Catholic Central	Yes	$789.66	22	5	$17,372.50
'2021'	44818	Springfield City Scho	39180	Warder Park-Wayne Element	SW-Exist	52829	Catholic Central	Yes	$789.66	17	1	$13,424.20
'2021'	44818	Springfield City Scho	18895	Kenwood Elementary	SW-Exist	55160	St Joseph	No	$0.00	1	0	$0.00
'2021'	44818	Springfield City Scho	32540	Roosevelt Middle School	SW-Exist	55251	St Luke	No	$0.00	0	0	$0.00

Title I Equitable Services



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

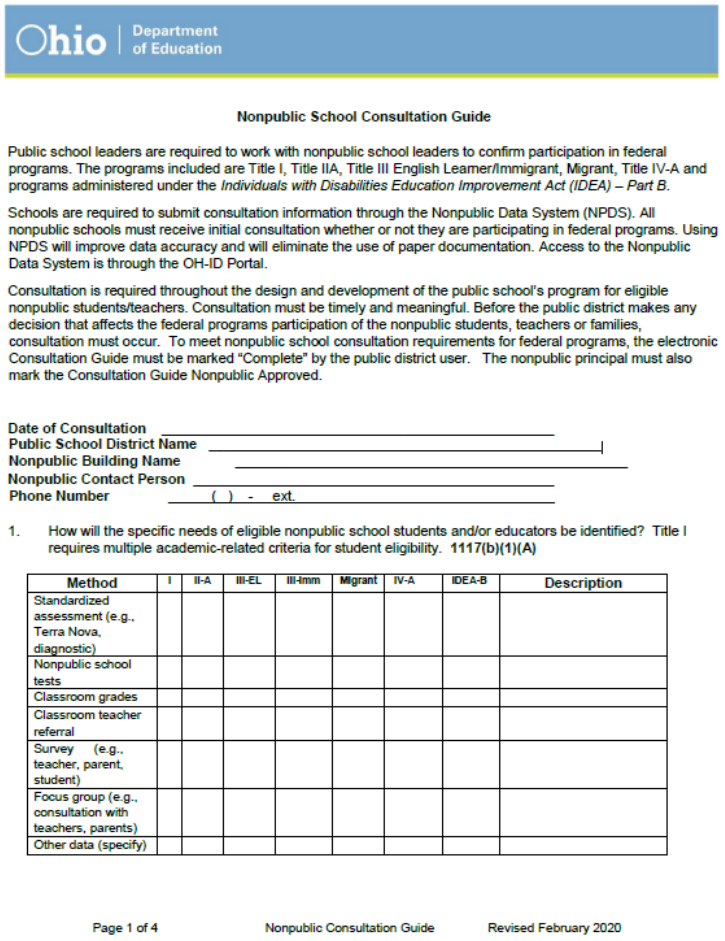
Title I , Part A – Additional Topics:
Method for Determining Number of Low-Income Students;
Consolidation and Coordination of Title Funds for Services;
Results of Consultation Agreement Must Be Transmitted to Ombudsman; Written Explanation for Disagreements

Title I Services

- Public District responsibility
- Public must maintain control
- Primary intent is to improve academic achievement of children at risk of not meeting the state's academic standards
- Services must meet an identified need, be secular and allowable under the grant

NPDS Consultation Guide

10.If the nonpublic has opted to participate in Title I through pooling or consolidation, please describe the method and consultation process that was used to arrive at this delivery method. **1117(b)(1)(J), 1117(b)(1)(L)**



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Nonpublic School Consultation Guide

Public school leaders are required to work with nonpublic school leaders to confirm participation in federal programs. The programs included are Title I, Title IIA, Title III English Learner/Immigrant, Migrant, Title IV-A and programs administered under the *Individuals with Disabilities Education Improvement Act (IDEA) – Part B*.

Schools are required to submit consultation information through the Nonpublic Data System (NPDS). All nonpublic schools must receive initial consultation whether or not they are participating in federal programs. Using NPDS will improve data accuracy and will eliminate the use of paper documentation. Access to the Nonpublic Data System is through the OH-ID Portal.

Consultation is required throughout the design and development of the public school's program for eligible nonpublic students/teachers. Consultation must be timely and meaningful. Before the public district makes any decision that affects the federal programs participation of the nonpublic students, teachers or families, consultation must occur. To meet nonpublic school consultation requirements for federal programs, the electronic Consultation Guide must be marked "Complete" by the public district user. The nonpublic principal must also mark the Consultation Guide Nonpublic Approved.

Date of Consultation _____
Public School District Name _____
Nonpublic Building Name _____
Nonpublic Contact Person _____
Phone Number ____( ) - ext.____

1. How will the specific needs of eligible nonpublic school students and/or educators be identified? Title I requires multiple academic-related criteria for student eligibility. **1117(b)(1)(A)**

Method	I	II-A	III-EL	III-Imm	Migrant	IV-A	IDEA-B	Description
Standardized assessment (e.g., Terra Nova, diagnostic)								
Nonpublic school tests								
Classroom grades								
Classroom teacher referral								
Survey (e.g., teacher, parent, student)								
Focus group (e.g., consultation with teachers, parents)								
Other data (specify)								

Page 1 of 4 Nonpublic Consultation Guide Revised February 2020

Service Delivery Models

- Contract with Properly licensed District hired staff
- Contract with Properly licensed nonpublic school teacher outside of their contracted hours
- Contract with Properly licensed third-party provider
- A Memorandum of Understanding (MOU) with the district where the nonpublic school sits

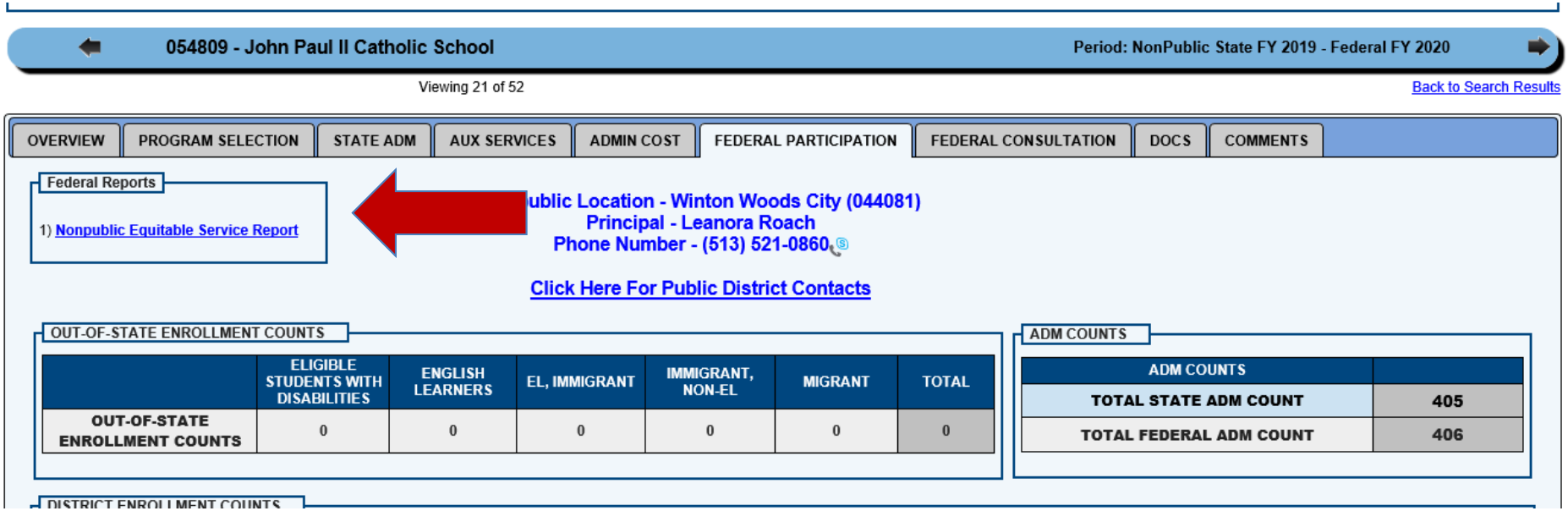
Title I Non-Regulatory Guidance: B8

- **B-8. What are the options available for providing equitable services to private school children?**
  - School by School
  - Pooling within an LEA
  - Pooling Across LEAs

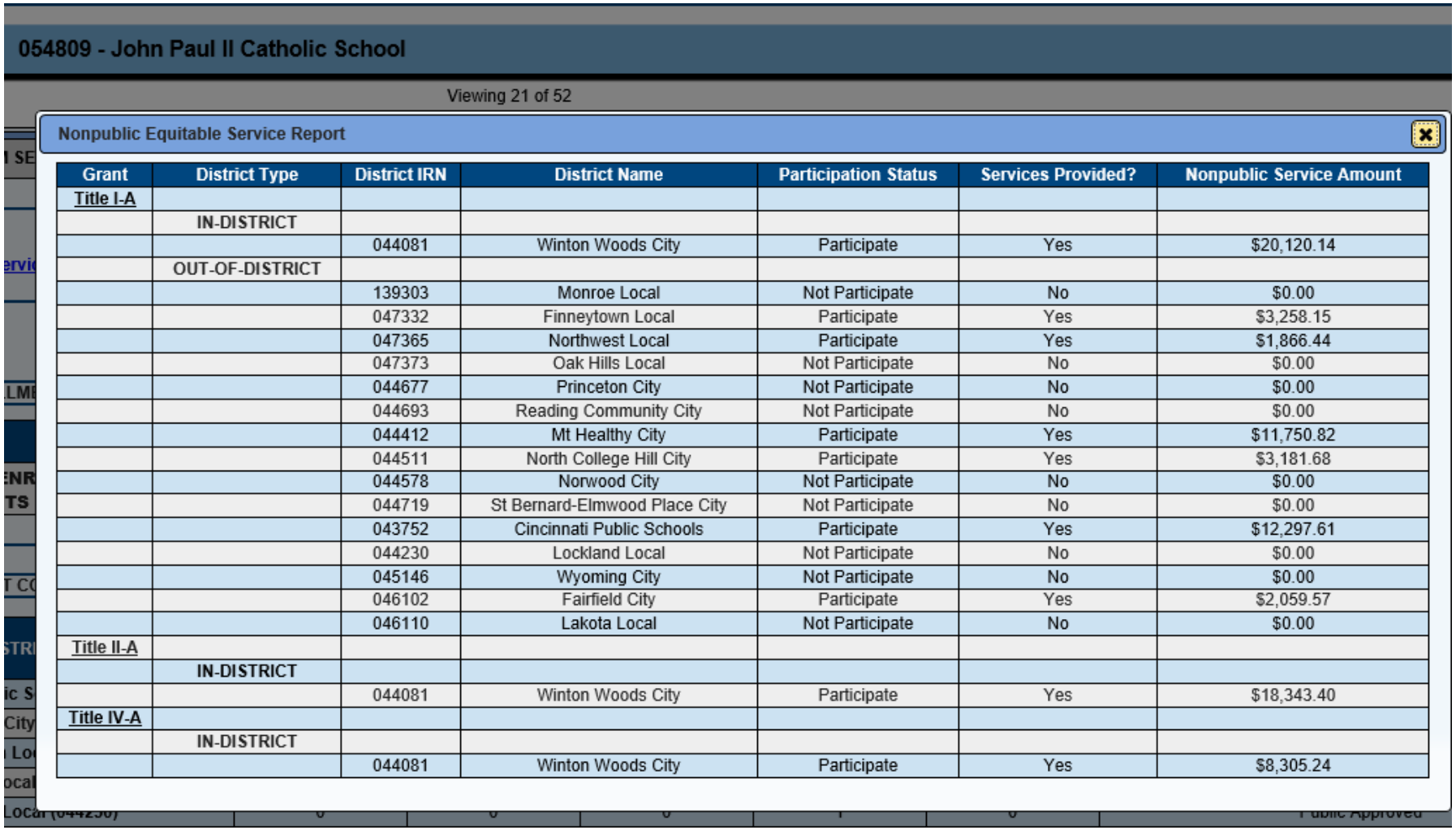
Not Pooling

- If you are not pooling funds, your service provider should be able to provide fiscal records and time and effort that demonstrate the amount of service that was provided exclusively to students from your district.
- Easiest with single district tutoring blocks
- Funds may not be comingled with auxiliary funds or funds from any other source

NPDS Equitable Services Report



NPDS Equitable Services Report



Grant	District Type	District IRN	District Name	Participation Status	Services Provided?	Nonpublic Service Amount
Title I-A						
	IN-DISTRICT					
		044081	Winton Woods City	Participate	Yes	$20,120.14
	OUT-OF-DISTRICT					
		139303	Monroe Local	Not Participate	No	$0.00
		047332	Finneytown Local	Participate	Yes	$3,258.15
		047365	Northwest Local	Participate	Yes	$1,866.44
		047373	Oak Hills Local	Not Participate	No	$0.00
		044677	Princeton City	Not Participate	No	$0.00
		044693	Reading Community City	Not Participate	No	$0.00
		044412	Mt Healthy City	Participate	Yes	$11,750.82
		044511	North College Hill City	Participate	Yes	$3,181.68
		044578	Norwood City	Not Participate	No	$0.00
		044719	St Bernard-Elmwood Place City	Not Participate	No	$0.00
		043752	Cincinnati Public Schools	Participate	Yes	$12,297.61
		044230	Lockland Local	Not Participate	No	$0.00
		045146	Wyoming City	Not Participate	No	$0.00
		046102	Fairfield City	Participate	Yes	$2,059.57
		046110	Lakota Local	Not Participate	No	$0.00
Title II-A						
	IN-DISTRICT					
		044081	Winton Woods City	Participate	Yes	$18,343.40
Title IV-A						
	IN-DISTRICT					
		044081	Winton Woods City	Participate	Yes	$8,305.24

Memorandum of Understanding (MOU)

LEA and Out of District LEA (SD)
Title I Non-Public School Program Agreement
Pooling ESEA 1117(b)(1)(J)
2019-2020 School Year

In compliance with the purpose of the Title I Non-Public School Program, LEA and SD, LEAs agree that:

LEA will provide properly licensed educators to implement the Title I program serving school district students attending nonpublic schools within the school district boundary. The amount of funding to support the Title I program will be calculated from the Ohio Department of Education's CCIP per pupil amount based on economic eligibility as reported by the nonpublic schools to LEA. The number of eligible pupils times the per pupil allocation for each participating nonpublic school will be used to calculate the total amount due to LEA from school district.

Tutors will use multi-criteria which include a standardized assessment to rank students based on academic performance and use this list to prioritize services for the most in need. Tutors will provide instruction based on the state academic standards. Non-public schools will administer a standardized post-test to evaluate students' growth and the effectiveness of the Title I nonpublic tutoring program. Copies of the student progress reports and the overall program evaluation will be shared in a timely manner with the LEA and State and Federal Program Office.

SD will make payment to LEA provided LEA has complied with the requirements listed below and provided the SD with proper documentation.

- ❑ For the 2019-2020 school year, the SD agrees to transfer funds from its Title I allocation to LEA for services in the amount of:
  - ❑
- ❑ For the 2019-2020 school year the SD agrees to transfer funds from its Title I allocation to LEA for parent involvement activities:
  - ❑
- ❑ LEA will provide the SD with school-parent compacts for the Title I students, evidence of parent involvement activities, trainings, materials, progress reports for Title I students, and eligibility criteria.
- ❑ Eligible students from the SD will be identified for service by the selection procedures designed by LEA.
- ❑ A separate list will be maintained of eligible school district students, ranked in order.
- ❑ DOS and the DOR agree after consultation to pool Title I funds across both DOR A and DOR B. Based on uniform criteria of educational need, the lowest-achieving eligible private school children who attend Private School A regardless of whether they reside in DOR A and DOR B and without regard to how much funds children from low-income families within their private school generate towards the pool. Eligible low-achieving children may receive Title I services even if their school has few or no children from low-income families who generate Title I funds.
- ❑ LEA agrees to include the students being served from the SD in all required district, state and/or Federal Title I reports for the 2019-2020 school year.

The LEA will provide for effective control over, and accountability for all funds, property and other assets. The LEA will maintain title to materials, equipment, and property purchased with allocated funds. The LEA will allow the nonpublic schools to keep the items from year to year, in accordance with approved ongoing activities, as long as records are maintained.

Memorandum of Understanding (MOU)

- District of Service (DOS) and the District of Residence (DOR) agree after consultation to pool Title I funds. Children will be selected based on uniform criteria of educational need. The lowest-achieving eligible private school children, regardless of whether they reside in DOS or the DOR and without regard to how much funds children from low-income families within their private school generate towards the pool. Eligible low-achieving children may receive Title I services even if their school has few children from low-income families who generate Title I funds.

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

Things to Consider

1. Signed MOU's in place at the start of the school year so that programs can be appropriately staffed.
2. Language in the MOU dictates everything.
3. Plan a program that will fully expend all generated funds.
4. Evidence of service must be provided at the time of invoice.
5. Discuss required parent engagement and supplies – will these funds be pooled?

Title IIA, III and IVA

- Title I – services FOLLOW the student – regardless of nonpublic school location.

- Title IIA, III and IVA equitable services must be provided to nonpublic schools located WITHIN your district bounds, regardless of where the children live.

Title IIA and IVA

- Title IIA and IVA Budget Details page

NOTE: Public School Districts with nonpublic schools located in their boundaries (in-district nonpublics) must complete this section.

Calculation of Nonpublic School Service Amount:

Number of Students		
Enrollment of Attendance Area (including public, nonpublic and students residing in the district educated in charter or JVSD):	**8,878**	
Participating Private School Enrollment:		**762**
Title II, Part A Allocation		
Total District Allocation - Total Governance/Admin Budget:		**$482,907.50**
Per Pupil Allocation		
Amount is calculated by dividing the district's allocation for Title II-A by the enrollment of attendance area:	**$54.39**	
Equitable Services		
Amount District must reserve for equitable services for participating private schools:	**$41,448.01**	

Title IIA and IVA

- Title IIA and IVA Nonpublic School Service pages

Nonpublic School Service

Springfield City School District (044818) - Clark County - 2021 - Consolidated - Rev 1 - Title II-A Supporting Effective Instruction

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IRN	Nonpublic School Name	Workflow Status	Participation Status	Are Services Being Provided?	Nonpublic ADM	Consultation Guide Status	Nonpublic Service Amount	Nonpublic Service Incoming Carryover Amount	Nonpublic Service Total
052829	Catholic Central	Public Approved	Participate	Yes (●) No ( )	515	Completed	$28,012.77	$14,749.60	$42,762.37
112490	Nightingale Montessori Inc	Public Approved	Participate	Yes (●) No ( )	141	Completed	$7,669.52	$2,772.25	$10,441.77
070656	Springfield Christian	Public Approved	Participate	Yes (●) No ( )	106	Completed	$5,765.73	$5,001.33	$10,767.06
								Nonpublic Service Grand Total	**$63,971.20**

Title IIA Allowable Activities

Allowable Activities Evidence Based Clearinghouse - (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.

Title IVA Allowable Activities

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 III

- Title III Nonpublic School Service page

Nonpublic School Service

Springfield City School District (044818) - Clark County - 2021 - Consolidated - Rev 1 - Title III Language Instruction for English Learners

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IRN	Nonpublic School Name	Nonpublic EL Count	Nonpublic Service Amount
052829	Catholic Central	34	$5,417.64
112490	Nightingale Montessori Inc	0	$0.00
070656	Springfield Christian	0	$0.00
		Nonpublic Service Grand Total	**$5,417.64**

Title III Allowable Activities

- Must be supplemental
- May not be used to meet the Civil Rights Obligation of the school
- Activities that Improve Instruction of English Learners, Engage Parents and Families and Professional development for teachers

Individuals with Disabilities Education Act (IDEA) Questions

- Mark Lynskey, Office of Exceptional Children

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Auxiliary Services Questions



Questions?



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