Nonpublic Equitable Services



FUTURE FORWARD OHIO

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Month Year

Ohio Department of Education

Today's Presenters

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Equitable Services – What should you be doing now?

- NPDS Participation Forms
- NPDS Consultation Guides
- Program Evaluation
- Carryover
- Gearing up for FY24

CONSULTATION

Documentation of Consultation Required

- 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

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

NPDS Participation Forms: Public Approved

CURRENT PARTICIPATION STATUS:

NonPublic Approved

UPDATE PARTICIPATION STATUS TO:

Public Approved
or
Correction Needed

Click here for Participation History

Title I Served in the Current Fiscal Year: Yes

ENROLLMENT TYPE	K	1	2	3	4	5	6	7	8	9	10	11	12	TOTAL
Total Enrollment	4	1	3	3	2	2	1	0	0	0	0	0	0	16
Free Lunch Or Equivalent	1	1	1	1	1	1	0	0	0	0	0	0	0	6
Reduced Price Lunch Or Equivalent	1	0	0	1	1	0	1	0	0	0	0	0	0	4

Sections

Title I-Part A: Improving the Academic Achievement of the Disadvantaged

Title II-Part A: Supporting Effective Instruction 1/1

Title III: Language Instruction for English Learners 1/1

Title III: Immigrant 1/1

Title IV: Student Support and Academic Enrichment 1/1

IDEA-Part B: Special Education 1/1

Export to PDF

Questions

Grant : Title I-Part A: Improving the Academic Achievement of the Disadvantaged **Question Count : 1**

» Question

Equitable services amounts must be calculated before any district set-asides. The amounts will be calculated after estimated allocations are loaded into the CCIP.

Funds allocated to an LEA for educational services and other benefits to eligible private school children, teachers and other educational personnel, and families must be obligated in the fiscal year for which the funds are received by the LEA [ESSA Section 1117(a)(4)(B)].

Total Low Income Students: 10

*Do you want to participate in Title I-Part A? (•) Yes ( ) No

*Was timely and meaningful consultation provided? (•) Yes ( ) No

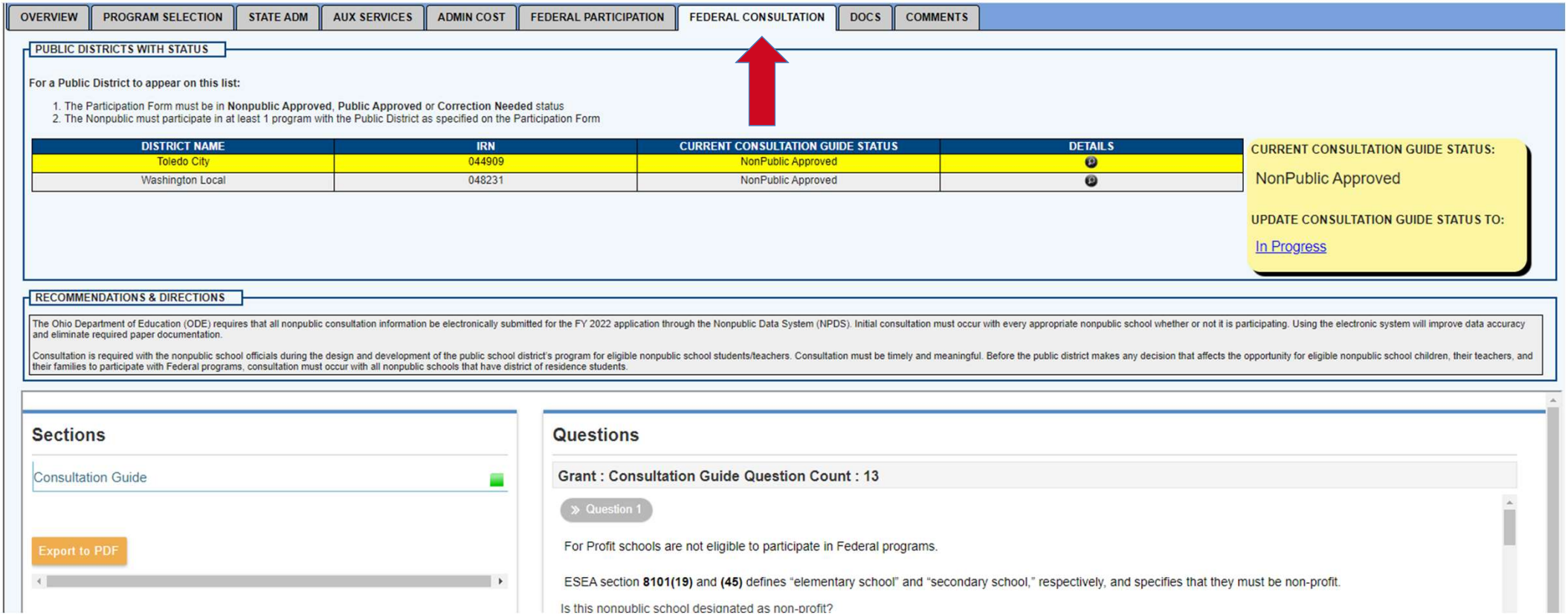
Initial Consultation Date: 5/7/2021

*Do you believe the services are equitable with respect to eligible private school children? (•) Yes ( ) No

Equitable Services Calculation



NPDS Consultation Guide



NPDS Consultation Guide + Evidence

Ohio | Department of Education

FY2021 Nonpublic Consultation Questions - 058487 Blessed Sacrament

Consultation Guide - Questions: (13/13) - Completed

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

Question 2

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

Title/Grant	Standardized Assessment	Nonpub School Tests	Classroom Grades	Classroom Teacher Referral	Survey	Focus Group	Other	Description
Title I-A: Improving Basic Programs	[√]	[√]	[√]	[√]				Map testing and written teacher recommendations based on grades, and student performance.
Title II-A: Supporting Effective Instruction	[√]				[√]	[√]		Annual building needs assessment and PD Committee review of accreditation goals
Title III: Language Instruction for English Learners								
Title III: Immigrant								
Migrant								

Print Date: 12/2/2021 Printed By: Lisa Huckins | 050765 - Dept Of Education | Survey Status: Completed Page 1 of 8

Program Evaluation

- Student progress data
- Parent survey data
- Did the program have the expected impact?
- Did you fully expend the equitable service amounts?
- If using a third party provider/another district, did you receive your Title I documentation?
- This information should drive your future decisions.

Title I Program Monitoring

- Multi-criterion forms
- Rank order list
- School parent compact
- Evidence of parent engagement (1% if required)
- Teacher schedules/service lists
- Teacher CORE ID
- Fiscal documentation



Payment to Providers

- Payment should happen before June 30, 2023
- Do NOT pay until you have evidence for monitoring
- TRACK down Invoices
- The public district is responsible



Carryover Guidance

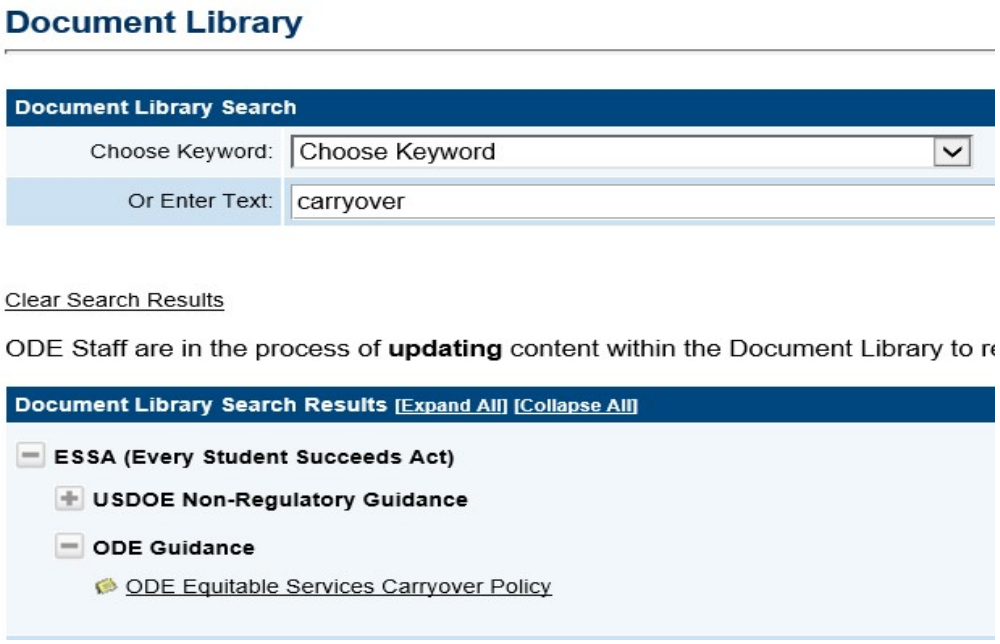
B-27. May an LEA carry over unobligated funds despite the statutory requirement regarding obligation of funds?

- If an LEA is providing equitable services as required and meeting the obligation of funds requirement in ESEA section 1117(a)(4)(B), it generally should not have any, and certainly not significant, carryover. The ESEA, however, does not prohibit carryover of funds for equitable services and, in most cases, requires it. The following are examples of circumstances that could result in carryover of equitable services funds and how an LEA would use such carryover:

Carryover Guidance

Reason for Carryover	Use of Carryover
Services for eligible children in one or more private schools are delayed (e.g., based on a natural disaster, delayed consultation, inability to employ qualified personnel, or unexpected procurement challenges). As a result, the LEA is unable to fully provide required equitable services, and some funds are unobligated at the end of the Federal fiscal year.	The LEA must use the funds to provide equitable services to eligible children in the affected private schools the following year.
An LEA uses a third-party contractor to provide equitable services, and the invoiced amount for services in one of the private schools is $1,000 less than anticipated. Because this occurs late in the summer, the LEA is unable to responsibly obligate the funds prior to the end of the Federal fiscal year.	The LEA, in consultation with private school officials, must use these funds the following year to provide equitable services to students in the affected private school. If, after consultation, those private school officials decline such services, the LEA must add the funds to the proportional share available for equitable services to other participating private schools. If there are no other participating private schools, the funds may be used to provide Title I services in public schools.

ODE Carryover Policy



https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=81051

A0

ODE Carryover Policy

1. Engage in consultation
2. Agreement between Public District and Nonpublic School
3. Action Plan in the Nonpublic Data System (NPDS)
4. ODE Approval and Validation

Slide 15

A0 Here, I would probably change this to "the district may be out of compliance." This is because of the scenarios mentioned in slide 30. There could be instances where they are actually required to carry over funds, and if due to unforeseen circumstances such as COVID/teacher shortage, etc., we want them to correctly carry forward amounts that are required to be carried over by USED. On the other hand, I know this is a slippery slope and in general "there should be no carry over." So I think we stick to the language in B-27. I will work on making sure the carry over policy matches the USED guidance on this particular issue, and will definitely bring back to you and Lisa for discussion when I have a draft. I will track changes. Let me know your thoughts on this.

Author, 2021-11-29T14:20:04.272

A0

ODE Carryover Policy Considerations



CARRYOVER FOR A SCHOOL THAT IS NOT PARTICIPATING IN FY24



POOLING ACROSS NONPUBLIC SCHOOLS



CARRYOVER OF CARRYOVER

Slide 16

A0 I understand this, but for the districts you might want to explain this in a more simple way for them... maybe give a scenario where a school tries to carry forward carry over funds that were first made available in FY21, and show that by the time the FER and carry over are loaded in FY23, this exceeds the 27 month period.

Author, 2021-11-29T14:23:04.310

Carryover Uses

- Same as all allowable uses
- Unsustainable – staffing not recommended
- Supplies and Equipment cap flexibility
- Summer programming
- Family Engagement
- Professional development
- Software and technology

Gearing Up for FY24

- Services should be in place at start of school
- CCIP Note #519 Licensure Flexibility
- CCIP Note #519 Title III Guidance Document

Summer Tasks

- In consultation with the nonpublic school, identify Title I services provider.
- Funds should be budgeted in CCIP application based on ongoing consultation.
- Ensure CCIP Details pages are reflective of nonpublic plans.
- Communicate FY24 service amounts and any unexpended FY23 to nonpublic school.
- Contracts should be approved over the summer.

Fall Tasks

- Verify there are eligible children from your district that will receive Title I services. If there have been changes, NPDS MUST be updated. Fall is the appropriate time.
- Verify that your service provider is in place.
- Begin to collect Title I documentation. Within a month of school starting, you should have multi-criterion forms, rank order list, teacher schedule and CORE ID number, school parent compact and plans for parent engagement.
- Federal reporting will begin in October!

Licensure Flexibility

- Individuals funded out of federal funds must be properly licensed as defined in the state. If a teacher providing equitable services is employed by a public district, the teacher must hold a regular Ohio teaching license in the grade span and subject areas for which Title I services are provided.
- If a teacher providing equitable services is employed by a third-party provider that is not a public district, the teacher may hold the same state-issued license as would be necessary in a public school, a permanent non-tax certificate, or in the case of non-chartered, non-tax supported schools, a bachelor's degree or equivalent diploma from a bible college.

Title III Guidance Document

Title III and English Learners in Nonpublic Schools

Title III and English Learners in Nonpublic Schools

Ohio Department of Education

January 2023

Purpose

Title III, Language Instruction for English Learners (ELs) and Immigrant Students is a grant authorized under the Elementary and Secondary Education Act (ESEA). The purpose of Title III is to help eligible students attain English proficiency and to reach high levels of attainment in state academic standards. Title III funds are used to assist teachers, principals, and other school leaders in developing and enhancing their capacity to deliver effective instructional programs for ELs and to promote the engagement of the parents and families of English learners.[1]

Equitable Participation

EL students in nonprofit nonpublic schools may be eligible to access Title III programs, services, and products through the Local Education Agency (LEA) where the nonpublic school is located. Funding for Title III programs and services to serve eligible ELs in nonpublic schools is determined by a count of eligible students attending nonpublic schools located in the public school district boundaries and is not dependent on where the student resides. The LEA where the nonpublic school is located must be accepting funds under Title III for ELs

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