CCIP Note #546

Re: Nonpublic Equitable Services and the Nonpublic Data System
Date: February 12, 2024
To: Superintendents, Treasurers, Authorized Representatives, Fiscal Representatives and Consolidated Funding Application Contacts, and Nonpublic Principals

NONPUBLIC DATA SYSTEM

The Nonpublic Data System (NPDS) is now open for the FY25 Participation Window and will close on March 31, 2024. During this period, nonpublic schools will create participation forms and move them forward for public approval. Nonpublic schools are reminded that they should ONLY create participation forms with districts from which they have disaggregated federal data; low income, English learners or eligible children with disabilities. Public districts should verify student addresses as well as the disaggregated data before marking the form Public Approved. If there are corrections that need to be made, blue edit pencils will be available for nonpublic principals to make those changes. For more information, please see page 11 within the State and Federal ADM Reporting Instructions.

If a nonpublic school failed to meet the upload deadline of December 31 and the district was not engaged in consultation during the period of time NPDS was open (October – December), there may be an opportunity to upload that data. Reach out to the nonpublic ombudsman for further instructions.

LOW-INCOME IDENTIFICATION

The Elementary and Secondary Education Act (ESEA) requires the public district to determine an accurate count of children from low-income families who attend public and private schools and live in participating Title I public school attendance areas in order to allocate the proportional share of Title I funds. The most common way to identify low-income status for nonpublic schools are the forms from the National School Lunch Program. If the school participates in this program, they'll have forms that have been completed by parents for free or reduced-price lunch. Many nonpublic schools do not participate in this program. For these schools, the Ohio Household Income verification form may be used. The federal guidance allows a few other methods to determine an accurate count of low-income students. For more information please refer to question B-11 in the Title I, Part A Nonregulatory Guidance.

In NPDS, the nonpublic school reports the number of "Free Lunch or Equivalent," and "Reduced Lunch or Equivalent" students for each grade level by public school building of residence. Then, the public district verifies the low-income counts provided by the nonpublic schools. If the public district has concerns about the accuracy of the data, it's important that the nonpublic school and the public district work in consultation to ensure accurate data is provided in the NPDS participation tab. Ultimately, it falls on the public district to ensure that data is accurate. If a public district believes the nonpublic school needs to use an alternate

method to determine accurate low-income counts, it should ensure that the method used is not administratively burdensome for the nonpublic school.

Low-income data has been reported in NPDS. The district should begin to verify this data and ensure it has been verified before marking participation forms Public Approved. All participation forms must be Public Approved by March 31, 2024.

NEW RESOURCES

The Office of Federal Programs has released two new nonpublic resources that may be helpful. The Nonpublic Toolkit is a "one-stop" shop for US Department non-regulatory guidance, OFP state guidance and useful forms and resources. The Nonpublic At A Glance document provides a timeline for consultation and nonpublic activities over the course of a year.

NON-CHARTERED, NON-TAX SCHOOL PARTICIPATION

Non-chartered, non-tax school guidance is available to assist public school districts in providing equitable services to non-chartered, non-tax schools. The district should have already reached out to NCNT schools within their bounds. If that did not happen during the fall reporting window, it should occur now.

OMBUDSMAN OPEN OFFICE HOURS

Ombudsman open office hours will be held the first Wednesday of every month at 10:00 am. This is open to public and nonpublic school officials. Come with your questions, concerns, issues or just to listen to the discussion.
March 6, 2024
April 3, 2024
May 1, 2024
June 5, 2024

Join on your computer, mobile app or room device
Click here to join the meeting
Meeting ID: 286 710 348 98
Passcode: YM9qH5

If you have questions, please contact Chantelle Carter, Nonpublic Ombudsman at Chantelle.Carter@education.ohio.gov or the ESEA Education Program Specialist in the Office of Federal Programs assigned to your district.