CCIP Note #578

Re: Nonpublic Data System (NPDS) Federal Reporting Window Open
Date: October 3, 2025
To: Superintendents, Treasurers, Authorized Representatives, Fiscal Representatives and Consolidated Funding Application Contacts, and Nonpublic Principals

NONPUBLIC DATA SYSTEM FEDERAL REPORTING WINDOW OPEN

The Nonpublic Data System (NPDS) data reporting window is open for both state and federal reporting. Nonpublic principals may now access the system, opt into programs and select public buildings/districts for which they are reporting students. Most nonpublic schools begin to report students during the first full week of October after their October counts are collected. The data window will close on **November 14, 2025**. Updated Instructions are available HERE.

Public districts should reach out to nonpublic schools where they have children enrolled and begin consultation for FY27. It is a best practice for the district to share this CCIP note with each nonpublic school listed on the FY26 CCIP Title I Nonpublic School Service page to discuss the data required to participate in each grant and to determine how the nonpublic school will be reporting low-income counts. Districts should monitor NPDS during this open window and ensure that the nonpublic schools with whom they have a relationship are moving their federal forms to Federal ADM Submitted status.

Important note: Nonpublic schools should only select districts from which they have federally disaggregated data (i.e. students from low-income families, English Learners, English Learners Immigrant or Eligible Children with Disabilities). There is no need to report every child on the Federal Participation tab, as we use the reported State ADM for Title II-A and Title IV-A calculations. Nonpublic school principals should not select districts without these counts. If the nonpublic user imports the buildings from last year and there are buildings for which the school does not have federally disaggregated counts, the user may use the trash can to remove the school prior to creating the Excel file. For more details, see the instructions linked above.

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 to allocate the proportional share of Title I funds. The most common way to identify low-income status for nonpublic schools is 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.

If the district intends to make changes with the way buildings are sort ordered on the Building Eligibility page in FY27, those conversations should begin now. For example, if the district is a Community Eligibility Program (CEP) district and may opt to rank order public buildings by Direct Certification counts only, that is a discussion that should be occurring now. If the district is considering making any change in FY27 like serving a building for the first time, closing a building or changing grade spans, that is a topic the district would want to discuss with its nonpublic schools now.

NON-CHARTERED, NONPUBLIC (NCNP) SCHOOL PARTICIPATION

Non-chartered, nonpublic school guidance is available to assist public school districts in providing equitable services to non-chartered nonpublic schools. The district must reach out to NCNP schools within their bounds and provide initial consultation. If the nonpublic school does want to participate, they should follow the steps in that guidance document.

OMBUDSMAN OPEN OFFICE HOURS

Nonpublic equitable services open office hours will occur the first Wednesday of every month from **10 a.m-11 a.m**. from September through May. Chantelle Carter, Nonpublic Ombudsman, will be available to answer questions and work through concerns or issues during this time. The sessions are open to public and nonpublic school officials. Attendees can join the meetings using the links below or on the Office of Federal Programs training webpage.

- November 5, 2025 (10 a.m. - 11 a.m.)
- December 3, 2025 (10 a.m. - 11 a.m.)
- January 7, 2026 (10 a.m. - 11 a.m.)
- February 4, 2026 (10 a.m. - 11 a.m.)
- March 4, 2026 (10 a.m. - 11 a.m.)
- April 1, 2026 (10 a.m. - 11 a.m.)
- May 6, 2026 (10 a.m. - 11 a.m.)

If you have questions, please contact Chantelle Carter, Nonpublic Ombudsman at Chantelle.Carter@education.ohio.gov or your Federal Program Specialist, listed as the Consolidated contact in the CCIP Address Book.