CCIP Note #588

Re: Nonpublic Data System (NPDS) Federal Reporting Window Now Open
Date: October 5, 2026
To: Superintendents, Treasurers, Authorized Representatives, Fiscal Representatives and Consolidated Funding Application Contacts, and Nonpublic Principals

NONPUBLIC DATA SYSTEM FEDERAL REPORTING WINDOW NOW OPEN
The FY28 Nonpublic Data System (NPDS) federal reporting window is now open, and districts may begin uploading data as of October 9. The data window will close on November 13, 2026. As a reminder, Ohio now has a combined state and federal reporting window. At this time, nonpublic schools may opt into federal programs, select districts and buildings for which to report and create and upload ADM excel files. Federal Participation forms and Consultation Guides will not be available until February during the Participation window. Instructions are available HERE.

Public districts should reach out to every nonpublic school where they have children enrolled and begin consultation for FY28. It is best practice to forward this CCIP note to each nonpublic school listed on the FY27 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. It is very important that the district verify all anticipated data is uploaded correctly. It is easier to address issues now than in the spring.

The Office of Federal Programs will hold a training on October 8. LEAs are encouraged to attend with their nonpublic school partners. You can access the training here:

October 8, 2026 (9 a.m. – 10 a.m.) – Nonpublic Updates and Verification of Data

**Important note: Nonpublic schools should only select districts from which they have federally disaggregated data, including low-income students, English Learner, 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. If you are a nonpublic school principal, you should not select districts without those counts. If you import your buildings from last year and see buildings where you do not have federally disaggregated counts, use the trash can to remove them prior to creating your Excel file.

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, the school will 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, the public district must 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 in FY28 that impact school eligibility, rank order, and service, the district should engage in consultation with the nonpublic schools about these potential changes now. For example, if the district participates in the Community Eligibility Program (CEP) and may choose to rank order public buildings by Direct Certification counts only, the district should engage in consultation with the nonpublic schools about this change. If the district will serve a building for the first time, close a building, or change grade spans, the district should engage in consultation with the nonpublic schools about these changes.

NON-CHARTERED, NONPUBLIC 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 non-chartered, nonpublic schools within their bounds and provide initial consultation. If the nonpublic school does want to participate, they should follow the steps in this document.

OMBUDSMAN OPEN OFFICE HOURS

Nonpublic equitable services open office hours will occur the first Wednesday of every month from **10 a.m-11a.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.

- October 7, 2026 (10 a.m. – 11 a.m.)
- November 4, 2026 (10 a.m. – 11 a.m.)
- December 2, 2026 (10 a.m. – 11 a.m.)
- January 6, 2027 (10 a.m. – 11 a.m.)
- February 3, 2027 (10 a.m. – 11 a.m.)
- March 3, 2027 (10 a.m. – 11 a.m.)
- April 7, 2027 (10 a.m. – 11 a.m.)
- May 5, 2027 (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.