

# PRIVATE SCHOOL PARTICIPATION IN FEDERAL PROGRAMS

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- Each October, County Superintendents upload all of the registered private/non-public schools into the OPI system.
- All private/non-public schools, and this includes home schools, are required under law to register with the County Superintendent.
- This information is then used to notify each public school district in the spring of each year of the private/non-public schools that operate within the district boundaries.

# DOCUMENTING PRIVATE/NON-PUBLIC SCHOOLS

- Each spring the OPI sends out a list of private/non-public schools within each district's boundaries.
- The district must then contact each private/non public school to determine if that entity wants to participate in federal programs.
- Districts must enter information on which entities are participating in federal programs through the OPI app.
- The public school is required to keep track of all contact.
- This must be reported to the OPI.

# CONTACTING PRIVATE SCHOOLS

- Discussions must be held between the LEA and private schools on the key issues related to Title services.
- This gives both groups an opportunity to express their views about the services.
- Helps to foster productive working relationships between the groups to better impact student achievement.

# CONSULTATION

- Ways the LEA will identify eligible students.
- Services to be provided.
- How and when the LEA will make decisions about the delivery of services.
- How, where, and by whom the LEA will provide services.
- The method and sources of data the LEA will use to identify eligible students.

## CONSULTATION REQUIREMENTS

- Services the LEA will provide to teachers and families of eligible students.
- Discussion of the delivery mechanisms the LEA will use to provide services.
- If a third-party contractor should be use:
  - MOU
  - LOA
  - Other contract

## MORE REQUIREMENTS

- LEA must keep records related to the consultations-Montana Open Meetings Law.
- Signed affirmations from private school.
- Consultation should be on-going.
- Private schools have the right to complain.
- Districts must submit all the consultation forms to the private school ombudsman by July 31, of each year for review.

# GENERAL CONSULTATION INFORMATION

- The Ombudsman is a new requirement under the ESSA.
- Role is to work on behalf of the private schools to make sure that high-quality services are provided.
- Assists private schools if they are not being treated fairly.

# OMBUDSMAN



# TITLE I

- Title I is the largest, federally funded educational program developed under the Elementary and Secondary Education Act of 1965.
- Present law is called the Every Student Succeeds Act-ESSA.
- Established to give supplemental educational services to at-risk students in order for them to catch up to their peers.
- All services must be in addition to regular classroom instruction.
- All services, materials, professional development, etc. must be in addition to, not in replacement of the regular educational program both in program and fiscal components.

## WHAT IS TITLE I?

- Under Title I, LEA's must provide services to eligible private school students if requested.
- In Montana, homeschools are considered private schools.
- Services must be to eligible elementary and secondary students, their teachers, and their families.
- "Equitable share"
- Services must be equitable to those provided to eligible public school children, teachers, and families.
- Services must be secular, neutral, and nonideological.

## ESEA/ESSA SEC. 1117

- Program should be assessed for effectiveness at the end of the year.
- Students should be assessed before program entry, during the program, and at the end of the year.
- Next steps should be discussed with the private school.
- Prepare for the next year.

# PROGRAM ASSESSMENT

- There are five main sources to determine poverty data:
  - Census count
  - Free and reduced lunch
  - Temporary Assistance for Needy Families (TANF)
  - Medicaid assistance
  - Proportionality
  - Community Eligibility Provision (CEP)
- These processes may be difficult in a private school, but it can be done every two years.

## ALLOCATING FUNDS

- Equitable services funds must be primarily for a Title I program.
- May not just be for professional development and supplies.
- General rule of thumb-2/3s of the funds should be for salaries and benefits; the remainder for PD and supplies.
- If there is no educational program, then there is no need for PD and supplies to support it.
- The public school owns all instructional materials and supplies!

## USES OF FUNDS

- Child must reside in a participating public school attendance area.
- Must meet the requirements to be served under Title I.
- LEA must work with the private school to determine eligibility.

# ELIGIBLE CHILDREN

**District A**

**Private School**

**Public Title I School A1**

**Public Title I School A2**

**Public Non-Title I School A3**

**District B**

**Public Title I School B1**

**Public Non-Title I School B2**

**District C**

**Public Title I School C1**

**Public Title I School C2**

**Public Title I School C3**

**Public Non-Title I School C4**

**Public Non-Title I School C5**

**District D**

**Public Title I School D1**

# ELIGIBLE CHILDREN, CONT.





- Districts with a population of 20,000 or more can request Title I funds from neighboring districts to pay for the equitable share portion if those districts have students attending a private school within its boundaries, or it can just absorb the costs.
- To avoid the previous scenario, the OPI uses another format to allocate funds to some public/private schools.
- Can only be used if there are 20,000 or less people residing in a district.
- Enrollment numbers for students and students on free/reduced lunch are combined between the public and private schools.

## CENSUS/ALTERNATIVE FORMULA

- LEA designs the Title I program with input from the private school.
- Must supplement and be well coordinated with the regular program.
- Service types: instructional services, extended day, family literacy, counseling, computer-aided instruction, home tutoring, etc.
- Must be secular, neutral, and nonideological.

## TYPES OF SERVICES

- Title I services to private school students must be set up like a TAS program.
- Students must be identified for services based upon multiple, educationally-related criteria.
- Must develop a prioritized list of eligible students.
- Materials and supplies purchased must supplement the regular educational program at the private school.

# TARGETED ASSISTANCE SERVICES

- Teachers and paraprofessionals who are employed by the LEA must meet the licensed/certified rules under the ESSA.
- Third-party providers.
- Hires outside of existing contracts with LEA/private school.
- All staff paid for with Title I funds are employees of the public school during Title I instructional time.

# QUALIFICATIONS

- If the district receives \$500,000 or more in Title I funds, it must set aside 1% for parental involvement and a portion of this must be used for parental involvement activities for private school parents.

# PARENTAL INVOLVEMENT

- Should assist public and private school staff.
- Must have meaningful consultation.
- Services must be equitable and paid for by the public school.
- Must only be for private school teaching staff directly working with identified Title I students.
- May also be provided under Title II, Part A.

## PROFESSIONAL DEVELOPMENT

- Reasonable amounts may be set aside to run the program at the public and private school.
- Third-party administrative costs are allowable.
- Expenses: furniture, purchase or lease of property, insurance and maintenance costs, transportation, etc.
- Cannot be used to renovate the private school site.

# ADMINISTRATIVE COSTS

- All requisitions must be done on the public school's forms.
- The public school buys airline tickets, makes reservations, pays all fees.
- No funds can go to the private school!!!
- Other reimbursements can go to employees: per diem, parking fees, etc.
- All need to be agreed to in the consultation process.

# PURCHASING PROCESS



- The equitable share will now be determined before district level set asides.
- Will most likely increase the funds available to the private schools.
- All funds must be expended in the year they were allocated-there is no more carryover of equitable share dollars.

## EQUITABLE SHARE SET ASIDES

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# OTHER FEDERAL PROGRAMS



**Title II, Part A (Title II)** of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act ( ESSE) provides grants to State educational agencies, local educational agencies, State agencies for higher education, and eligible partnerships in order to —

(1) increase student academic achievement through strategies such as improving teacher and principal quality and increasing the number of highly qualified teachers in the classroom and highly qualified principals and assistant principals in schools; and

(2) hold local educational agencies and schools accountable for improvements in student academic achievement.

# TITLE II PROGRAM



**Title III, Part A (TITLE III)** of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act (ESEA), provides grants to:

-to help ensure that children who are limited English proficient, including immigrant children and youth, attain English proficiency, develop high levels of academic attainment in English, and meet the same challenging State academic content and student academic achievement standards as all children are expected to meet;

# TITLE III

**Title IV, Part A (Title IV)** of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act (ESEA) provides grants to support programs that prevent violence in and around schools; that prevent the illegal use of alcohol, tobacco, and drugs; that involve parents and communities; and that are coordinated with related Federal, State, school, and community efforts and resources to foster a safe and drug-free learning environment that supports student academic achievement.

# TITLE IV

Districts can now transfer all funds to Title I to prevent private/non-public schools from participating in Title II, III, and IV-after consultation.

Districts must calculate the equitable share after a transfer to another program.

The equitable share for Title I would now be determined after any transfer to Title I.

This also takes away some flexibility for districts who want to transfer funds to Title I by limiting the amount that can be moved.

## RECENT *USED* DECISIONS

# LINKS TO OPI DOCUMENTS

<http://opi.mt.gov/Leadership/Academic-Success/Title-Other-Federal-Programs/Private-Schools>

<http://opi.mt.gov/LinkClick.aspx?fileticket=R0moMiY7YXc%3d&portalid=182>

<http://opi.mt.gov/LinkClick.aspx?fileticket=Ld8WJtdgZ4A%3d&portalid=182>

<https://egrants.opi.mt.gov/opigmsweb/logon.aspx>

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# CONTACT INFORMATION