PRIVATE SCHOOL PARTICIPATION IN FEDERAL TITLE PROGRAMS

ZACH HAWKINS

OPI TITLE I & FEDERAL PROGRAMS DIRECTOR; PRIVATE SCHOOL OMBUDSMAN

MAY 2, 2024

- Grew up near Troy, MT
- Started my professional career teaching in Hays, MT 2000
- Taught in Heart Butte, MT 2001-2004
- Worked in federal college access programs for 12 years
- OPI IEFA Director Dec. 2018-March 2024
- Took over this role on March 11th

MY BACKGROUND

PRIVATE SCHOOL OMBUDSMAN

- The Ombudsman is a requirement under the Every Student Succeeds Act (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

AGENDA

Private School Participation ESEA/ESSA	Title I	School and Student Eligibility	Basics of Public/Private School Partnerships
Annual Timeline	Participation Agreement and Non-Public School Database	Consultation and Planning	Title II
Title III	Title IV	Equitable Share	Egrants
	Website/Forms		

ESEA/ESSA SECTION 1117

- 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

WHAT IS 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 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. "Supplement not supplant"

HOW DO SCHOOLS AND STUDENTS PARTICIPATE IN TITLE PROGRAMS?

- Students must reside in a participating public school attendance area
- Must meet eligibility the requirements to be served under Title I
- Eligible private school students are counted in public school's allocation formula
- LEA must work with private school to determine eligibility
- Students must show academic deficiency & have a plan to improve beyond need to services

BASICS OF STRONG PUBLIC/PRIVATE PARTNERSHIPS

- Common Understanding and Communication
- Effective Consultation Process
- Services Tied To School Needs And Plans
- Commitment to Doing What's Best For Students

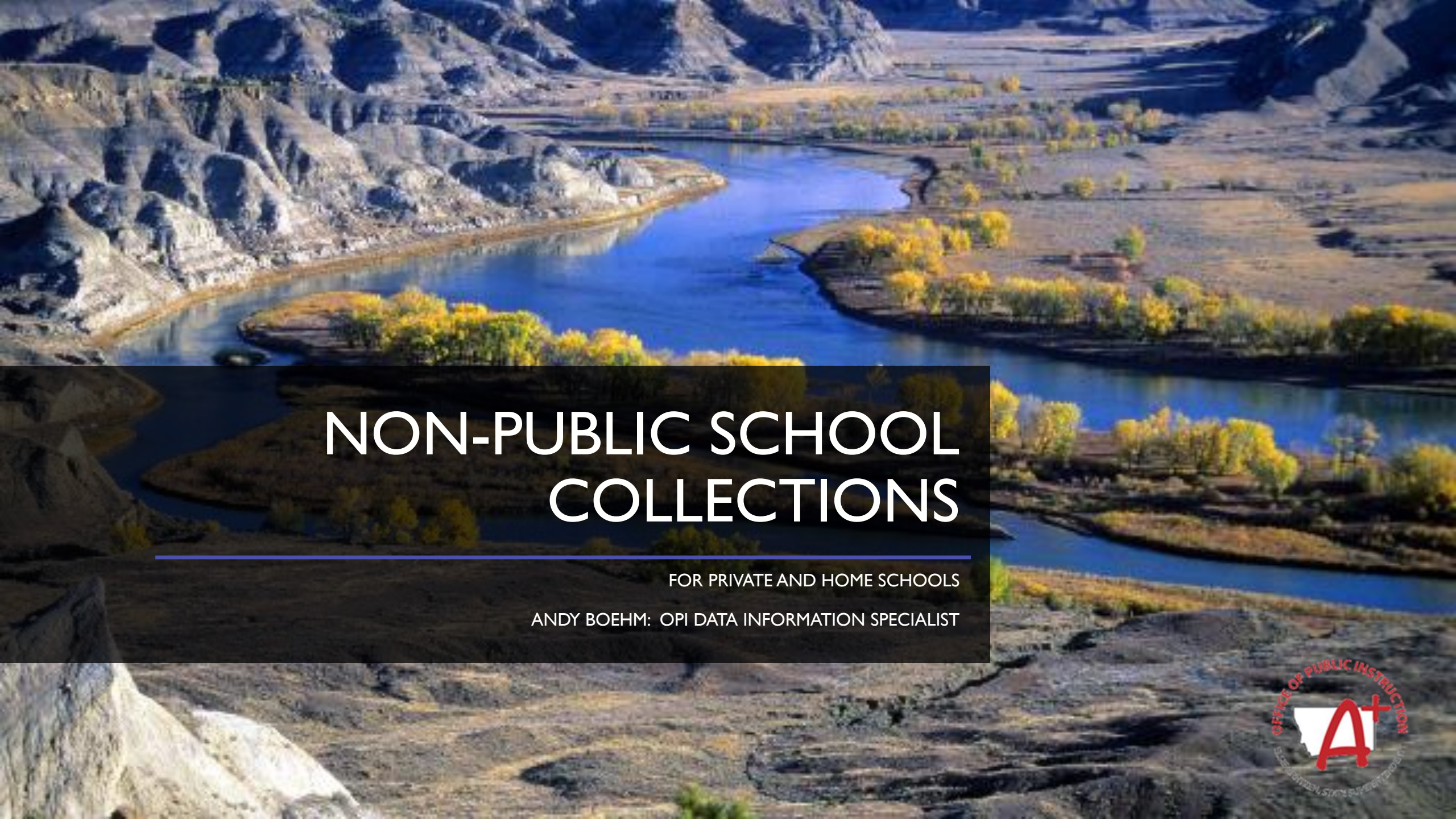
ANNUAL TIMELINE

March-April: Participation Agreements and Non-Public Database Updates

May-July: Consultation Period.
Affirmation of Consultation and Interlocal Agreements Due July 31st

July-August: Public Schools Report # of Private School Students Served

October: Private & Homeschools Report Student Numbers to County Supt.



NON-PUBLIC SCHOOL COLLECTIONS

FOR PRIVATE AND HOME SCHOOLS

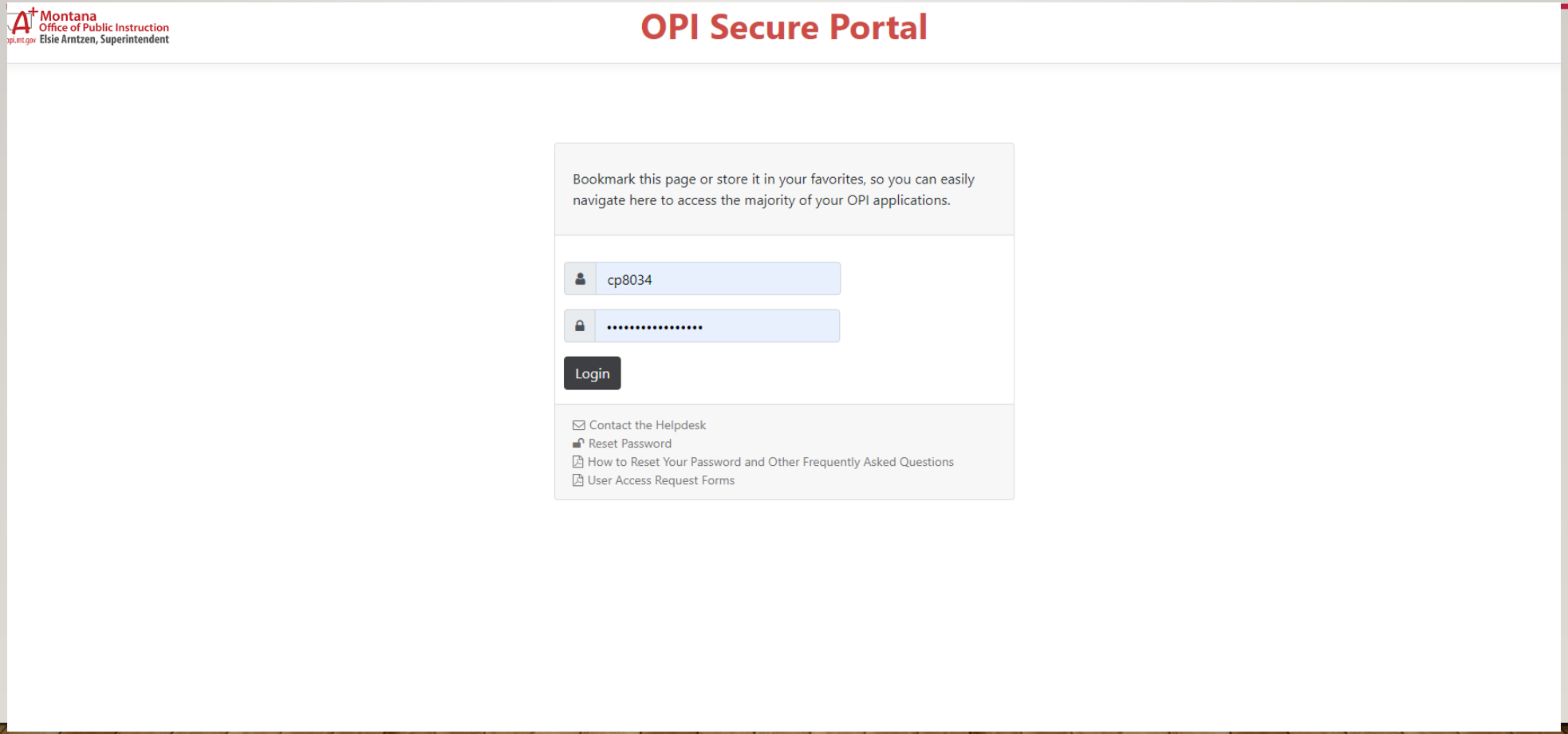
ANDY BOEHM: OPI DATA INFORMATION SPECIALIST

CLICK

- https://apps.opi.mt.gov/nonpublicschool/frmLogin.aspx

- **These screenshots may vary from yours**

LOGIN WITH ACCOUNT



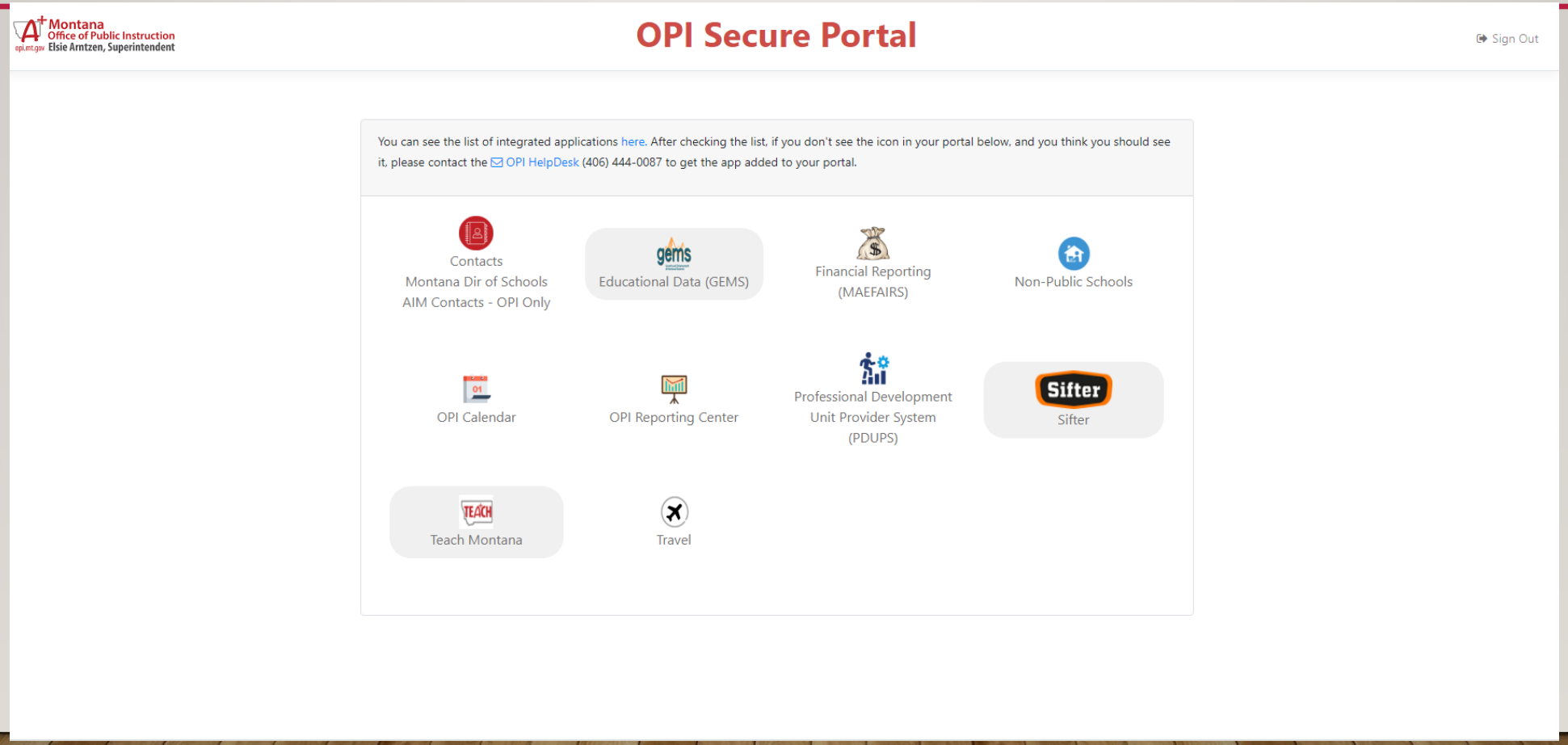
USERNAME/PASSWORD

Reset your password the first time you log in

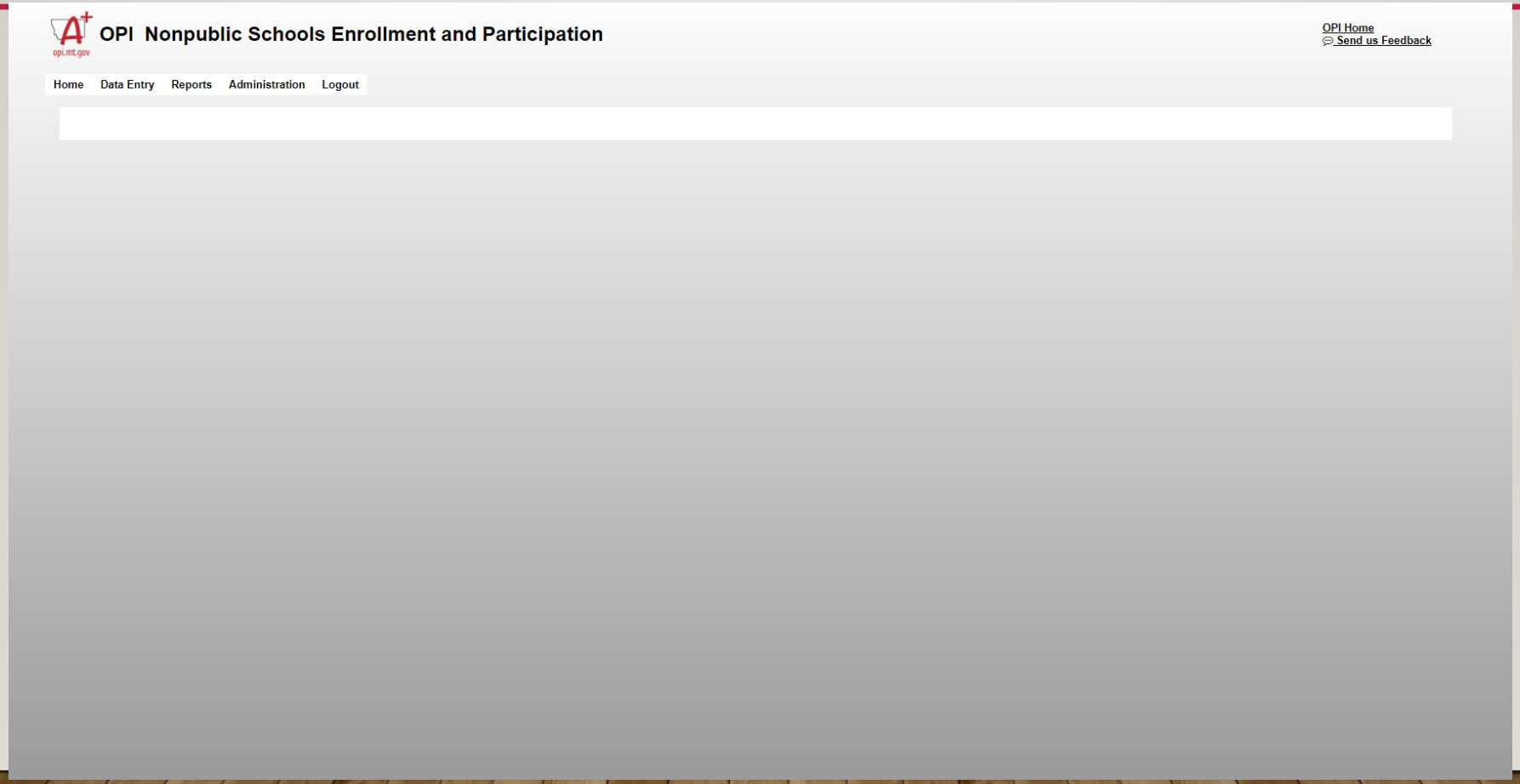
Anytime you forget/expire

Passwords expire after 60 days

CLICK ON NON-PUBLIC SCHOOLS



MAIN SCREEN

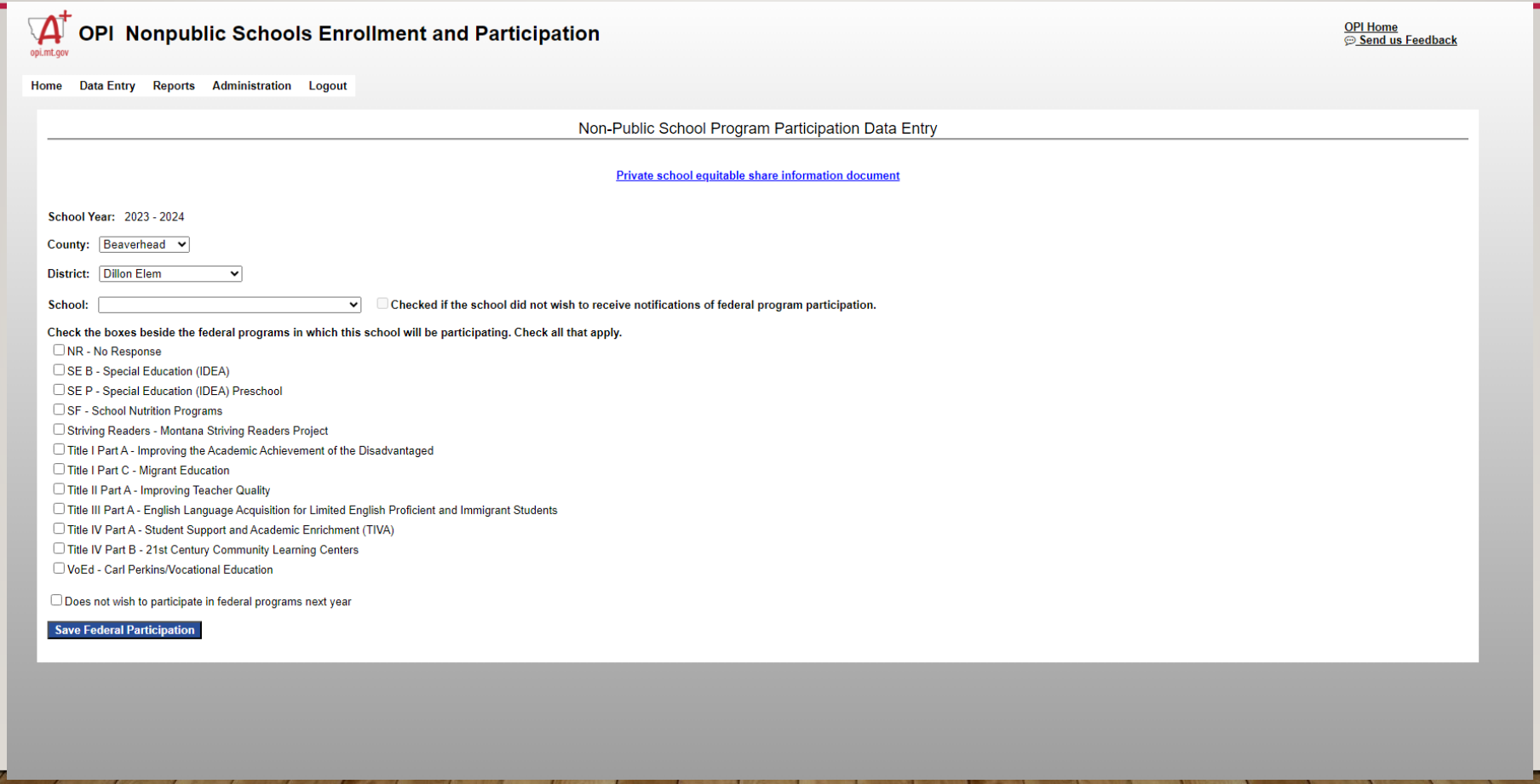

OPI Nonpublic Schools Enrollment and Participation
opi.mt.gov
OPI Home
Send us Feedback
Home
Data Entry
Reports
Administration
Logout

SELECT DATA ENTRY

- Fall School Data (Co Supt)
- October Count Day

- Spring Federal Participation Data (District)
- March

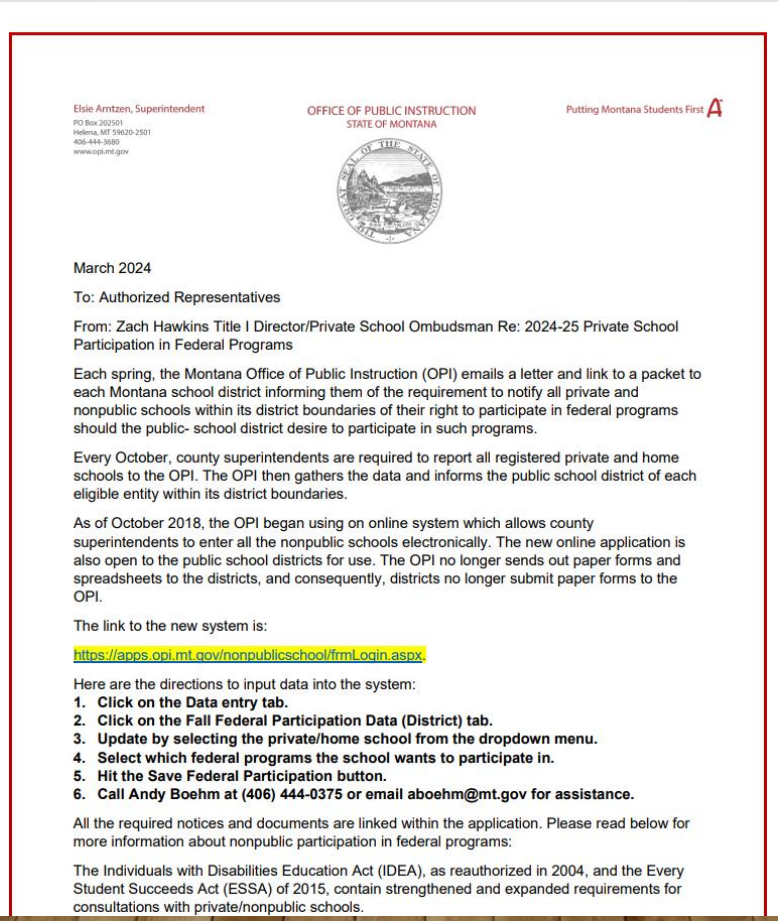
SELECT SCHOOL AND PROGRAMS



CLICK ON PRIVATE SCHOOL EQUITABLE SHARE INFORMATION DOCUMENT

- More Information on programs
- Mail (Certified) to all of the nonpublic schools in your district
- How to sign up
- Form for the nonpublic schools to sign

LETTER TO THE AR FROM TITLE I DIRECTOR



Elsie Arntzen, Superintendent
PO Box 202501
Helena, MT 59620-2501
406-444-3680
www.opi.mt.gov

OFFICE OF PUBLIC INSTRUCTION
STATE OF MONTANA

Putting Montana Students First

March 2024

To: Authorized Representatives

From: Zach Hawkins Title I Director/Private School Ombudsman Re: 2024-25 Private School Participation in Federal Programs

Each spring, the Montana Office of Public Instruction (OPI) emails a letter and link to a packet to each Montana school district informing them of the requirement to notify all private and nonpublic schools within its district boundaries of their right to participate in federal programs should the public- school district desire to participate in such programs.

Every October, county superintendents are required to report all registered private and home schools to the OPI. The OPI then gathers the data and informs the public school district of each eligible entity within its district boundaries.

As of October 2018, the OPI began using on online system which allows county superintendents to enter all the nonpublic schools electronically. The new online application is also open to the public school districts for use. The OPI no longer sends out paper forms and spreadsheets to the districts, and consequently, districts no longer submit paper forms to the OPI.

The link to the new system is:

https://apps.opi.mt.gov/nonpublicschool/frmLogin.aspx.

Here are the directions to input data into the system:

1. **Click on the Data entry tab.**
2. **Click on the Fall Federal Participation Data (District) tab.**
3. **Update by selecting the private/home school from the dropdown menu.**
4. **Select which federal programs the school wants to participate in.**
5. **Hit the Save Federal Participation button.**
6. **Call Andy Boehm at (406) 444-0375 or email aboehm@mt.gov for assistance.**

All the required notices and documents are linked within the application. Please read below for more information about nonpublic participation in federal programs:

The Individuals with Disabilities Education Act (IDEA), as reauthorized in 2004, and the Every Student Succeeds Act (ESSA) of 2015, contain strengthened and expanded requirements for consultations with private/nonpublic schools.

SELECT REPORTS TAB

- Run the Enrollment Spreadsheet to get complete addresses
- Run the Federal Program Participation Spreadsheet
- To QA your Federal Programs data entry work

CONSULTATION

- Discussions must be held between the LEA and private schools on the key issues related to Title I 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 REQUIREMENTS

- 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

MORE 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
- Third-party contractor should use
    - MOU
    - LOA
    - Other Contract

GENERAL CONSULTATION INFORMATION

- 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
- Title I application (Egrants) must be available to the private school

STEPS IN THE PLAN

- Decide on the instructional plan based upon the Needs Assessment.
- Discuss what supplies will be needed by the public school and private to run the program (Third-party provider)
- What types of professional development will be needed
- How, when, and what types of assessments will be used to determine progress
- Exiting criteria
- Program evaluation

PROGRAM ASSESSMENT

- 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

ALLOCATING FUNDS

- 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

EQUITABLE SHARE SET ASIDES

- The equitable share is now determined before district level set asides
- This increases 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 unless there was some unforeseen situation

USES OF 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!

TYPES OF SERVICES

- 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

TARGETED ASSISTANCE 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

QUALIFICATIONS OF TITLE SERVICE PROVIDERS

- 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

PROFESSIONAL DEVELOPMENT

- Should assist public and private school staff
- Must have meaningful consultation
- Services must be equitable and paid for by the public school
- Can share PD opportunities.
- Must only be for private school teaching staff directly working with identified Title I students-which is just about everyone!

ADMINISTRATIVE COSTS

- 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

PURCHASING

- 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

TITLE II

Supporting Effective Instruction

- Based upon a school needs assessment and teacher growth plans
- Private school staff may also participate in Title II, Part A
- Private school equitable share funds may only be used for professional development activities.
- Private school is required to complete a needs assessment for school PD needs, and it should also look at teacher professional growth plans.
- District may invite private school staff to its own PD activities, and a portion of those costs may come out of the equitable share set aside.
- Private schools may use a portion of the equitable share funds to attend PD like the National Catholic Schools conference.
- District may not reimburse the private school but may directly pay staff members.
- Christy Hendricks, Title II coordinator, Christy.Hendricks@mt.gov or 406-444-0794

TITLE III

- Title III assists ELs, including immigrant children and youth, to develop English proficiency and to meet the same challenging state academic standards that other children are expected to meet.

- Schools must use Title III funds to implement language instruction educational programs that are keyed to the overall standards. SEAs, districts, and schools must report the English proficiency and core academic content knowledge of ELs.

- Title III has a dual purpose: to help ELs meet the same state academic achievement standards applicable to all students, and that they develop proficiency in the English language. These goals are closely related but distinct.

TITLE IV-A

- Title IV Part A is also known as **Student Support and Academic Enrichment (SSAE).** The SSAE program is intended to improve students' academic achievement by increasing the capacity to provide all students with:
  - **Access to a well-rounded education**
  - **Improve school conditions for student learning, safe and healthy students**
  - **Improve the use of technology to improve the academic achievement and digital literacy of all students**

The LEA should consult with its private school(s) prior to making any decisions to transfer Title IV-A funds. If the public school determines, based on their needs assessment, that a transfer will occur, the private school students will receive their equitable share of services based upon the program to which the funds are transferred.

TRANSFER ORDER

- After consultation, and even if the non-public objects, the district can move funds from one federal program to another, even if this removes all federal funds from a program.
- For example, the district moves Title II, III, and IV funds to Title I. This means that there would be no equitable share funds for the private school in those programs as the fund balance would be zero. However, there would be an increase in the equitable share dollars for Title I.
- Funds may not be left behind in a federal program just for equitable share.
- The equitable share for this situation would be based upon any amount left behind.

E-GRANTS

- Egrants is the online federal funds application system used by MT districts.
- It does not need any special software, just the ability to connect to the Internet.
- The program calculates the equitable share, and districts will budget set aside funds within the program.
- Private/non-public tab shows how much each non-public gets.
- The budget pages show where the funds are being used.
- https://egrants.opi.mt.gov/opigmsweb/logon.aspx

WEBSITE AND FORMS

Welcome to Federal Programs

The Elementary and Secondary Education Act (ESEA) was first passed in 1965, becoming the U.S. Department of Education's primary funding vehicle for providing resources to the nation's schools. Every few years since 1965, the "Act" has been modified and reauthorized. Consequently, since it has been a reauthorization of the same Act, the general name, ESEA, has remained the same. The most recent act, the Every Student Succeeds Act (ESSA), was passed by Congress and signed into law by President Obama on December 10, 2015.

In general, the ESEA/ESSA Act of 2015 includes provisions that will help ensure success for students and schools. Listed below are a few highlights of the law:

- Advances equity by upholding critical protections for America's disadvantaged and high-need students.
- Requires for the first time, that all students in America be taught to high academic standards that will prepare them to succeed in college and careers.
- Ensures that vital information is provided to educators, families, students, and communities through annual statewide assessments that measure students' progress toward those high standards.
- Helps to support and grow location innovations, including evidence-based and place-based interventions developed by local leaders and educators, consistent with our investing in Innovation and Promise Neighborhoods.
- Sustains and expands this administration's historic investments in increasing access to high-quality preschool.
- Maintains an expectation that there will be accountability and action to effect positive change in our lowest-performing schools, where groups of students are not making progress, and where graduation rates are low over extended periods of time.

The major federal educational programs authorized under the ESEA/ESSA are Title I, Part A; Title I, Part C; Title I, Part D; Title II, Part A; Title III, Title IV Subpart 1 & 2; Title V, Subpart 1 & 2; and Title IX, McKinney-Vento Homeless Education.

- Title I, Part A: Improving Basic Programs
  - Family Engagement
  - Foster Care
  - Private Schools
  - School Support
- Title I, Part C: Migrant Education
- Title I, Part D: Neglected or Delinquent
- Title II, Part A: Supporting Effective Instruction
- Title III: English Learners

QUESTIONS??

- Zach Hawkins
- zachariah.hawkins@mt.gov
- 406-444-3083