



Equitable Services for Private School Stakeholders

**SY 2024-2025 Federal Programs Consultation
and Collaboration Informational Meeting**



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General Requirements for Provision of Equitable Services

Elementary and secondary private schools, including religiously affiliated schools, with **non-profit status** are **eligible to participate** in many programs under the Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act (ESSA), as well as IDEA and Perkins V funding programs as applicable.



Federal Programs Covered by Equitable Services Requirements

- ESSA, Title I, Part A - Improving the Academic Achievement of the Disadvantaged
- ESSA, Title I, Part C - Education of Migratory Children
 - Not applicable to SCPS
- ESSA, Title II, Part A - Supporting Effective Instruction
- ESSA, Title III, Part A - English Language Acquisition and Language Enhancement
- ESSA, Title IV, Part A - Student Support and Academic Enrichment Grant
- ESSA, Title IV, Part B - 21st Century Community Learning Centers
- Individuals with Disabilities Education Act
- Strengthening Career and Technical Education for the 21st Century Act (Perkins V)



Consultation Requirements

- Ongoing and meaningful consultation with private school leaders on specific topics is required. Consultation topics vary slightly by federal program.
- Consultation includes:
 - Annual information session
 - Program-specific initial consultation
 - Collaborative equitable services plan development meetings to generally include, but not limited to understanding student needs, identification of services to be provided, and assessment of such services. [Details available online in *Equitable Services for Private Schools: Private School Consultation and Federal Program Coordination Handbook*.]
 - Ongoing consultation throughout school year



Annual Consultation Timeline

- January 16 – Information Session
- **January 26 – Federal Programs Interest Form Due**
- January/February – Initial Consultation by Program Administrators*
- Early Spring – Equitable Services Plans Finalized

* Title I, Part A initial consultation occurs immediately following return of the Federal Programs Interest Form, as certain required data collection efforts are time sensitive.

Note: Select federal programs do not follow a traditional July-June project period, resulting in slight variation in the consultation timeline.



Equitable Services Provision

- Federal programs under ESSA have specific guidance for determining allocations of funds for private school use.
 - Title I, Part A
 - Title II, Part A, Title III, Part A & Title IV, Part A
- From the proportionate share of federal funds available to provide equitable services, the school district is permitted to reserve an amount that is reasonable and necessary to administer equitable services.
 - Cost is specific to administering the private school programs only and does not consider any public-school administration needs.
 - Administrative costs must be a topic for consultation and allowability varies from program to program.
- The following programs require *equitable services*, yet do not specifically allocate certain amounts based on set per pupil allocations; all support is provided through service to students or staff.
 - IDEA
 - Perkins V



ESSA, Title I, Part A - Improving the Academic Achievement of the Disadvantaged

- Title I programs at private schools are developed collaboratively by the district and private school administrators. An extensive list of required consultation topics will be discussed over several months.
- The Title I consultation timeline includes several due dates for private schools to submit required information:
 - A list of students enrolled at the school, including date of birth, street address and current grade level (mid-February);
 - Completed income surveys (mid-March);
 - Selection criteria forms and supporting documentation of academic need (May).



Generating Funding:

- The private school equitable share of the district's Title I allocation is calculated using the percentage of identified low-income private school students who live at an eligible address (zoned to attend a public school that receives Title I support) compared to the number of low-income public school students attending Title I schools.
- To identify low-income, private school students, the law requires that we use the same measure as that used in public schools (students who qualify for free or reduced-price lunch), or a similar measure, if a private school does not participate in the free lunch program.
- Low-income students are counted during a specific window of time in February/March.
- Students who live in neighboring districts will not generate funding in Seminole, but in their home district.



Eligible Students:

- Title I provides supports to improve the academic achievement of students who:
 - 1) live in a Title I school zone, and
 - 2) have a documented need for academic support.

Low-income status is used to determine the funds allocated to each school.
There is no income requirement for students to receive support.
- In May, schools recommend address-eligible students for the program by submitting evidence that the student is performing below grade level. In addition to the classroom teacher's assessment of the student's mastery of grade-level standards, one or two additional sources of documentation are required to be submitted (e.g., standardized test scores, recent report card, formative assessments).
- The best method to support students will be discussed during consultation. Most often, schools prefer a pull-out program during the school day, or after-school tutoring.
- Title I services must be supplementary to classroom instruction. Services during the school day may not replace classroom instruction in core subject areas.



Title I Supports for Parents & Classroom Teachers:

- A portion of each school's allocation will be used to provide activities which encourage parents/guardians of participating students to be more engaged in their child's education.
- Schools may choose to use a portion of their allocation to provide professional learning activities for the classroom teachers of participating students. Trainings must focus on instructional strategies which, when implemented, will positively impact the academic performance of participating students.
 - If the decision is made to utilize Title I funds for professional learning, the funds available for student instruction will be less

ESSA, Title II, Part A - Supporting Effective Instruction

Purpose

- The purpose of this part is to provide 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.



ESSA, Title II, Part A - Supporting Effective Instruction

How do we participate?

- Complete the “Federal Programs Interest Form”
- Provide Proof of Nonprofit Status
- Participate in the February/March Program Planning Session
- **Complete the Needs Assessment & Program Application**
- Participate in Consultative Process throughout Grant Cycle

ESSA, Title II, Part A - Supporting Effective Instruction

How much would we receive? - Example

Approximate Seminole Allocation:	\$2,000,000
Less Allowable Administrative Costs (3.93%):	\$78,600
Total Amount to be Dispersed:	\$1,921,400

Total Public/Charter School *K-12 Enrollment:	68,000
Total Participating Private School *K-12 Enrollment:	4,400
Total Enrollment:	72,400

Estimated Per Pupil Allocation:	\$26.53
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* Title II-A serves only teachers and administrators in K-12 settings. Therefore, Pre-K enrollments are not considered in allocation estimates. This slide is intended only to illustrate the process for equitable allocation of funds and is not intended as a reflection of the actual allocation and/or student enrollments.



ESSA, Title III, Part A - English Language Acquisition and Language Enhancement

- The priority of Title III funds is to improve the educational achievement of English Language Learners (ELLs) by increasing their English language proficiency and their ability to meet the same challenging state academic content and standards.
- Any student whose parent answered “yes” to any questions on the Home Language Survey is referred by the school counselor/designee to the district ESOL Department. Students must be tested within 20 days from the student entry date.
- Title III funds provide supplemental support for ELLs.

ESSA, Title III, Part A - English Language Acquisition and Language Enhancement

Area of Focus 1	Increasing English Language proficiency to meet the challenging state academic standards.
Area of Focus 2	Increasing supplemental professional development
Area of Focus 3	Increasing parental and community participation in the educational experience of ELLs

Supplemental Materials Requests may include Professional Development, Software Licenses, Dictionaries



ESSA, Title IV, Part A - Student Support and Academic Enrichment Grant

Title IV, Part A is intended to help increase districts' capacity by enhancing the following goals:

- Area of Focus 1: Provide students with access to a well-rounded education [ESSA section 4107]
- Area of Focus 2: Improve safe and healthy school conditions for student learning [ESSA section 4108]
- Area of Focus 3: Improve the use of technology in order to improve the academic achievement and digital literacy of all students [ESSA section 4109]

Please see the Title IV, Part A- Student Support and Academic Enrichment Private Schools Consultation Process handout for more information.

Area of Focus 1 - Well-Rounded Educational Opportunities

- Well-rounded educational opportunities are programs and activities that provide an enriched curriculum and educational experience to all students.
 - This may include: an expansion of successful programs and activities to additional schools such as an afterschool club or tutoring opportunity for students; equipment that would enhance classroom instruction such as microscopes in science, a diversified classroom library in English; and implementation of new initiatives such as the creation of a new CTE course or opportunity for students to receive certifications.
 - Examples of previous district activities are STEAM supplies including robotics kits, professional development for teachers, supplemental materials for core subjects, college and career readiness including tutoring and tuition waivers, and music education which ranges from the purchase of sheet music and instruments to band competitions.



Area of Focus 2 - Safe and Healthy Conditions

- Safe and healthy learning conditions are programs and activities that foster safe, healthy, supportive, and drugfree school environments.
 - This may include adding wellness programs for both students and faculty such as a calm down area or additional school nurses; additional mental health supports and instruction beyond state requirements; and the creation of a dropout prevention program which may include afterschool tutoring, credit recovery, and additional testing opportunities.
 - Examples of previous district activities are
 - Social and Emotional Learning (SEL) and mental health programs and resources
 - Professional development
 - Additional personnel (graduation coaches, SEL specialist, paraprofessionals, behavior interventionist)
 - Physical education enhancement with additional supplies and new activities
 - Parental and community involvement



Area of Focus 3 - Effective Use of Technology

- The effective use of technology component includes programs and activities, including hardware, software, and digital content, that improve the academic achievement, academic growth, and digital literacy of all students.
 - This may include the creation of a credit recovery or advanced course. An LEA created an advanced algebra course for middle school students completing Algebra I; teachers receiving a supplement to serve as a technology coach at their school; and student and parent sessions to show them how to access virtual materials.
 - Examples of previous district activities are
 - The purchase of equipment including computers, 3D printers, tablets, hotspots
 - Professional development
 - Online resources
 - Software
 - STEM/STEAM equipment



Title IV- Part A Consultation

- Elect to participate in Title IV- Part A
- You will receive an email inviting you to set up a consultation appointment. Please take advantage of the consultation to ensure your planned activities are allowable in the grant.
- Submit your planned activity on the provided template by the due date.



ESSA, Title IV, Part B - 21st Century Community Learning Centers

- The 21st Century Community Learning Centers (21st CCLC) program provides free, high-quality educational programming to students during non-school hours or during periods when school is not in session (i.e., after school and/or summer).
- Major activities provided for participants of the program include:
 - academic enrichment in reading/language arts, mathematics and science;
 - personal enrichment such as physical education, dropout prevention and character education activities, homework help, mentoring services, educational arts and music activities, and technology education programs; and
 - literacy and parent education for adult family members.

Note: Enrichment offerings and operating days/hours differ by program site.



ESSA, Title IV, Part B - 21st Century Community Learning Centers

- Students enrolled in private, nonprofit schools located in the geographic attendance zone for each targeted school are eligible to attend all aspects of the 21st CCLC program. Similarly, teachers and other educational personnel are welcome to receive equitable services, which may include attending professional development opportunities offered by the 21st CCLC program.
- Program sites for 2023/2024:
 - Altamonte Elementary School
 - English Estates Elementary School
 - Hamilton Elementary School
 - Midway Safe Harbor
 - Pine Crest Elementary School

Note that transportation is not provided from a private school to these programs.

Individuals with Disabilities Education Act

- Child Find Obligation
 - Testing in coordination with zone/assigned schools
 - Nonpublic Student Study Team
 - Parents must communicate with the district
- Services for students with disabilities attending nonprofit private schools
 - Speech Therapy provided by SCPS Speech-Language Pathologists
 - School/Staff Training
- Feedback survey later in the school year to consult with nonprofit private schools to plan for next school year



Individuals with Disabilities Education Act

- Contact:
 - Sheri Fanelli (sheri_fanelli@scps.us) Area Administrator
 - Tanya Shores (tanya_shores@scps.us) Director of ESE



Strengthening Career and Technical Education for the 21st Century Act (Perkins V)

- **Purpose**

- Principle source of federal funding to states for the improvement of Career and Technical Education (CTE) programs in secondary and postsecondary

- **Eligibility**

- FDOE Career and Technical Education programs for grades 6-12 only

- **Contact**

- Allie Hilliard at allie_hilliard@scps.us or (407) 320-0386



Use of Federal Funds

- Permissible Uses
 - All activities under the equitable services provision must align with the intended purpose of each federal program.
 - In accordance with ESSA, Section 8501 (2), all educational services or other benefits – including materials and equipment – provided from these federal programs must be secular, neutral and non-ideological.

K-12 ESEA Common Federal Program Guidance (excerpts as applicable to equitable services)

- **Contracted Services may not exceed \$3,000 per full day** of service (including travel)
 - District must submit contract/agreement or scope of work to the FDOE for review at the time of application.
 - Must include purpose, rationale, projected number of individuals to be served and a cost breakdown of the services to be performed.
 - Materials to support the services may be requested as an additional expense.
- **Out-of-state travel may be allowable** if the services requested are reasonable, necessary and meet the intent and purpose of the grant program.
 - District must submit to the FDOE a justification for preapproval.
 - Must include the purpose for the travel, why it cannot be provided within the state of Florida, the projected number of attendees and a cost breakdown (registration fees, hotel, per diem, car rental/airline ticket, etc.) of the travel. The number of attendees requested shall also be reasonable.



Use of Federal Funds

- Carryover of Funds
 - ESEA section 1117(a)(4)(B) allows for consultation related to carryover of funds for private schools. [Applicable to Title I, Part A only.]
 - ESEA section 8501(a)(4)(B) indicates that funds allocated to a school district for educational services and other benefits to eligible private school children, teachers and other educational personnel, and families *must be obligated in the fiscal year for which the funds are received by the school district*. [Applicable to all other ESSA entitlement programs described today.]



Local Control of Funds

- Funds may not go directly to a private school.
- Control of funds for services and assistance provided to private school students, parents, and teachers must remain with the school district.
- The school district must maintain the title/ownership to any materials, equipment and/or property purchased with federal funds.
 - A Memorandum of Understanding (MOU) must be signed by a private school administrator prior to receipt of certain materials, equipment or technology.
 - Annual inventory must be completed on certain materials, equipment or technology.
 - Any non-consumable materials, equipment or other property obtained through federal programs will be returned to the district should the school not qualify for services or have no further use for the equipment in the manner in which was agreed upon in the service delivery plan.
 - The district must initiate any contracts for goods or services planned for private school students, parents or teachers.



Important Considerations

- The school district is not permitted to reimburse a private school directly; rather, the district may only obligate and expend federal funds on behalf of private schools (ESSA, Section 8501(6)(d)).
- All equitable service expenditures must comply with the school district's procurement and finance policies and procedures.



Complaints and the State Ombudsman for Private Schools

- ESSA, Sections 1117 and 8501 requires state educational agencies to designate an ombudsman to monitor and enforce equitable services requirements to help ensure equitable services and other benefits for eligible private school children, teachers and other educational personnel, and families. The equitable services ombudsman is the state's primary point of contact for addressing questions and concerns pertaining to the equitable services requirements.
- Florida's Private Schools Ombudsman, Nicolle Leider, can be reached at 850-245-9349, however, an email is preferred: equitable.services@fldoe.org



Applicable Federal Guidance

- Every Student Succeeds Act (ESSA)
<https://www.ed.gov/essa?src=policy>
- U.S. Department of Education, Equitable Services to Private Schools – Non-Regulatory Guidance
<https://www2.ed.gov/programs/titleiparta/ps.html>
- Florida Department of Education, Private Schools Equitable Services
<http://www.fldoe.org/finance/equitable-services/>



Next Steps

- Required Federal Programs Interest Form – **Due January 26, 2024**
 - Online submission at: <https://forms.gle/4XqL6vtHLQB3FnwXA>
 - Program Consultation
 - Individual school consultation will be provided following submission of the Federal Programs Interest form.
- Program Plan Requirement
 - Template to be emailed to federal programs contact indicated on the Federal Programs Interest Form

Contact Information

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407-320-0382

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Federal Projects & Resource Development Website:

https://www.scps.k12.fl.us/district/departments/resource-development/consultation_with_private_schools.shtml