

**Equitable Services for Private Schools**  
***Private School Consultation and Federal Program Coordination Handbook***  
Seminole County Public Schools

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# Introduction and General Requirements for Provision of Equitable Services

Several federally funded programs require school districts to provide the opportunity for equitable participation of private school students, teachers, principals, and other school leaders. Elementary and secondary private schools with nonprofit status, including religiously affiliated schools, are eligible to participate in many ESSA programs, as well as IDEA and Perkins V funding programs as applicable.

Under the Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act (ESSA), programs with an equitable services provision include:

- Title I, Part A - Improving the Academic Achievement of the Disadvantaged
- Title I, Part C - Education of Migratory Children
- Title II, Part A - Supporting Effective Instruction
- Title III, Part A - English Language Acquisition and Language Enhancement
- Title IV, Part A - Student Support and Academic Enrichment Grant
- Title IV, Part B - 21st Century Community Learning Centers

Section 1117 of ESSA contains provisions that pertain to the participation of students enrolled in private schools under Title I, Part A and Title I, Part C.

Title VIII of ESSA – *sections 8501-8506* – contains the Uniform Provisions (Part F) language that pertains to the participation by private school students and other educational personnel in the programs listed above.

Outside of ESSA, the Individuals with Disabilities Education Act (Section 1412 (a) (10)) and the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) – Section 217, also contain similar requirements for equitable participation of private schools.

The **purpose** of this handbook is to ensure uniformity in the implementation of the private school provisions across federal programs within Seminole County. Topics covered in this handbook include:

- Notification, Consultation, and Planning
- Provision of Services or Funding Allocations under Federal Programs
- Carryover
- Eligible Activities and Program Implementation
- Record Keeping
- Complaints and the State Ombudsman for Private Schools
- Applicable Federal Guidance

## Notification, Consultation and Planning

Notification of private school eligibility to participate in various federal programs available through Seminole County Public Schools begins in *January of the school year preceding implementation*. Specific deadlines are provided to private school officials to ensure timely and meaningful consultation occurs.

In December/January of each year, the school district contacts nonprofit private schools located in Seminole County via email and certified mail, inviting each to participate in an informational meeting to discuss the provision of equitable services under ESSA, IDEA and Perkins V. The annual private schools meeting provides an opportunity for private school officials to learn about the federal programs implemented by the district. District-level federal program staff members conduct a presentation to the private school officials regarding the services available under each federal program. Following district staff's presentations, private school officials have the opportunity to ask questions regarding the programs and/or speak one-on-one with a federal program administrator.

Following the annual informational meeting, the district requests that private schools complete and submit an "*Elect to Participate*" form, and accompanying attachments, by a specific deadline. This deadline is set to ensure consultation can be scheduled with interested schools prior to the district's final planning and submission of the federal program application to the Florida Department of Education.

Once the *Elect to Participate* forms are received by the district, one-on-one and/or small group consultation meetings are conducted by the federal program grant administrator, with a specific focus on school-based needs in the area(s) covered by the program. Consultation topics, as required by ESSA, Sections 1117(b) and 8501(5)(c), addressed in the meeting(s) include the following:

- Identification of students' needs.
- What services will be offered; services including materials and equipment must be secular, neutral, and non-ideological.
- How, where, and by whom the services will be provided.
- How services are assessed and how the results of the assessment will be used to improve those services.
- The size and scope of the equitable services provided to eligible private school children, teachers, and other educational personnel.
- The proportionate share of funding allocated for services and how the funding allocated is determined.
- How and when decisions about delivery of services will be made and how the private school officials will be notified of those decisions.
- Whether services shall be provided by the school district directly or through a separate government agency, consortium, or entity, or through a third-party contractor.
- Whether to provide equitable services to eligible private school children by pooling funds allocated for the program's purpose.
- What methods or sources of data will be used to determine the number of children from low-income families in participating school attendance areas who attend private schools. (Title I only)
- How, if the public school district disagrees with the views of the private school officials on the provision of services through a contract, the public school district will provide in writing to the private school officials an analysis of the reasons why the district has chosen to use or not to use a contractor. (Title I only)
- When, including approximate time of day, services will be provided. (Title I only)

- Total carryover funds available for the provision of equitable services under the respective program(s) and in determining how carryover funds will be used (ESEA sections 1117(b) and 8501(c)).

Under IDEA Section 1412 (a) (10), the timely and meaningful consultation process must cover the following items:

- The child-find process for private schools – how private school students can participate equitably and how parents, teachers, and private school officials will be informed of the child find process and procedures.
- What the proportionate share amount is and how it was calculated.
- The consultation process and how it will operate throughout the school year so eligible students can participate in special education and related services. Services must be comparable in quality, not quantity.
- How, where and by whom proportionate share funds will be allocated, including a description of the types and amounts of services that will be provided. The LEA must make the final decisions with respect to the services to be provided (even if there are insufficient funds to serve all SWD) after receiving views from the participants.
- The method that the school district will use, if it disagrees with the views of the private schools on services, to provide a written explanation of why it chose not to follow the views of the private schools. *[Note: If there is a disagreement, the school district must provide to the private school officials a written explanation of the reasons why the school district chose not to accept the recommendations of the private school officials.]*

Under Perkins V, Section 217(b)(2), the school district must consult (upon written request) in a timely and meaningful manner with nonprofit private school officials regarding the meaningful participation of enrolled secondary school students in career and technical education programs and/or participation of private school staff in professional development activities funded under this Act.

Following consultation and planning stages, private school officials will be able to agree with the following statements (*adapted from the U.S. Department of Education, Title IX, Uniform Provisions Non-Regulatory Guidance*):

- I have a general understanding of the federal programs available to my students and teachers.
- I have discussed with school district officials how my students' needs will be identified.
- The school district official has explained what services can be offered.
- I have been given a genuine opportunity to present the needs of my students and teachers.
- I have been given the opportunity to explain how my students' needs can best be met through the federal program.
- I participated in a discussion of how, where, and by whom the services will be provided.
- I have had an opportunity to genuinely express my views on the use of a third-party provider (if applicable).
  - If a third-party provider was requested, there was a thorough consideration and analysis of this proposal.
  - If a third-party was requested and not granted, a written explanation has been provided as to the reasons why the school district has elected to not use a third-party provider.
- Student and program assessments were discussed and I understand how the results of assessments can be used to improve the services to my students and teachers.
- I have been told how much funding is available for services and how the funding was determined.
- I know how and when the school district will make the final decision about services and how and when I will be informed about the services.

- Collaboratively, the school district and I have set dates for periodic meetings throughout the school year to discuss the progress of the program and make modifications, as necessary, to improve effectiveness.
- I am aware of deadlines for submitting requests and providing necessary information to the school district, to include specific deliverables and/or evaluation documentation for activities funded by the federal program(s).
- I have been given a genuine opportunity to have my views heard and considered.
- I know who to contact if I have questions or concerns regarding federal programs.
- I provided an affirmation of federal programs consultation to the school district.

The following timeline ensures ongoing communication and collaboration between the district and nonprofit private schools in Seminole County. Please also see the annual deadlines established for private school actions following the table below.

***Federal Programs - Year at a Glance***

<b>Month</b>	<b>Consultation Activity for Current School Year</b>	<b>Consultation Activity for Next School Year</b>
<b>August</b>	<ul style="list-style-type: none"> <li>▪ Begin programs and services at the start of the school year or within 30 days of grant award, as appropriate by program.</li> <li>▪ Engage in ongoing consultation with private school officials about programs and services to be implemented and modify as necessary.</li> </ul>	
<b>September - October</b>	<ul style="list-style-type: none"> <li>▪ Continue consultation about <i>current</i> programs and implementation of services.               <ul style="list-style-type: none"> <li>○ Following finalization of FA399 forms by Finance, consult with private school leaders on any projected roll forward funds from prior school year, as appropriate, and make a tentative plan for when the certified roll forward is received.</li> </ul> </li> <li>▪ Order items proposed in private schools' budgets (allocations) or within 30 days of grant award, as appropriate by program.</li> </ul>	
<b>November/December</b>	<ul style="list-style-type: none"> <li>▪ Consult with private school officials about the status of <i>current</i> programs and services.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Obtain complete list of all private schools with appropriate contact names for use in the following year's consultation efforts [<i>Data source: Florida Department of</i></li> </ul>

Month	Consultation Activity for Current School Year	Consultation Activity for Next School Year
		<p><i>Education Private School Database]</i></p> <ul style="list-style-type: none"> <li>▪ Send invitations for annual information meeting</li> </ul>
<b>January</b>	<ul style="list-style-type: none"> <li>▪ Continue consultation with private school officials about the status of <i>current</i> programs and services.</li> <li>▪ Review budget expenditures and/or services provided to date, and develop an action plan for expenditure, as necessary.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Conduct the districtwide annual consultation meeting with all nonprofit private school officials to provide a general overview of programs that will be available to students, parents, teachers and administrators.</li> <li>▪ <b>“Elect to Participate” due to the school district for private school participation in programs.</b></li> </ul>
<b>February -March</b>	<ul style="list-style-type: none"> <li>▪ Continue consultation with private school officials about the status of <i>current</i> programs and services. <ul style="list-style-type: none"> <li>○ Upon receipt of certified roll forward letter from FDOE, conduct final consultation with private school leaders on any roll forward from prior school year, as appropriate</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Consult with private school officials to identify students’ and teachers’ needs, discuss services and estimated federal allocations, design programs, and establish priorities.</li> <li>▪ Provide private school officials with federal programs planning template, preliminary allocation (as available) and deadline for submission to prepare the schools for consultation.</li> </ul>
<b>April-May</b>	<ul style="list-style-type: none"> <li>▪ Review budget expenditures and/or services provided to date, and complete <b>the Equitable Services Roll Forward Consultation</b> form, as necessary.</li> <li>▪ Evaluate programs and services for the <i>current</i> school year and make suggestions for modifying programs that will be implemented again in the <i>next</i> school year.</li> <li>▪ Provide private school officials with the <b>“Consultation Attestation” form for submission to the school district</b> to acknowledge ongoing consultation efforts for the <i>current</i> school year.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Consult with private school leaders to complete plans for programs/services and set dates for when services will begin in the <i>next</i> school year. <b>Program plans are due to the school district by the established deadline for the year.</b></li> </ul>

Month	Consultation Activity for Current School Year	Consultation Activity for Next School Year
<b>June</b>	<ul style="list-style-type: none"> <li>▪ Finalize actions, including any required deliverables and/or evaluation documentation, related to programs and services for the <i>current year</i>.</li> </ul>	
<b>July-August</b>		<ul style="list-style-type: none"> <li>▪ Inform private school officials about the readiness of programs and services for the <i>upcoming</i> school year.</li> <li>▪ Provide private school officials with the “<b>Consultation Attestation</b>” form for <b>submission to the school district no later than the start of services</b> to acknowledge initial consultation efforts and inclusion in the district planning processes for the <i>upcoming</i> school year.</li> </ul>
<b>August - October</b>		<ul style="list-style-type: none"> <li>▪ Provide final allocations to private school officials for upcoming school year; timeline for distribution of these final allocations is pending receipt of the district’s final allocations from the FDOE.</li> </ul>

**Annual Deadlines for Private School Expenditures:**

- Within 30 days of award: In consultation with the grant administrator, the private school leader will finalize all requests for goods/services under the equitable services allocation provided.
- No later than 60 days before the end of the grant: Any requests for amendments to the private school use of funds for equitable services must be made with the grant administrator.
- No later than 45 days before the end of the grant: All requests for purchases and/or services will be initiated by the private school leader, with all funds expended within 30 days of the grant’s closure. \* **Note that any supplies, supplemental materials or curriculum, and/or equipment must be received and implemented within the program purpose before the close of the grant period.**
- **IMPORTANT** - All **travel requests** require pre-approval from the school district *and* FDOE. The FDOE requires at least 30 days notice prior to the travel date to approve all out-of-state travel.
  - No travel, *in or out-of-state*, will be approved by the school district if the request is received less than 30 days prior to the date of the activity. The “Professional Development Pre-Approval Request Form” is required for any travel related to professional learning.

## Provision of Services or Funding Allocations under Federal Programs

Federal programs under ESSA have specific guidance for determining allocations of funds for private school use.

Under ESSA Section 1117(4)(A)(ii), the proportionate share of Title I, Part A funds for private schools shall be determined based on the total amount of Title I, Part A funds received by the Local Educational Agency (LEA) prior to any allowable expenditures or transfers by the LEA. The steps to determine the Proportionate Share formula are calculated as follows:

- The LEA determines the participating public school attendance areas of Title I schools only.
- The LEA determines the number of children from low-income families residing in each participating area (Title I schools) who attend public and private schools.
- The LEA determines proportion of children from low-income families residing in each participating area (Title I schools) who attend private schools.
- The LEA applies the private school proportion to the LEA's total Title I allocation to determine the equitable services proportionate share.

Under ESSA, Title II, Part A, Title III, Part A, and Title IV, Part A, allocations are calculated by the school district using data provided by private schools to the Florida Department of Education through the school's annual report (K-12 enrollment). Equitable services to participating private schools is based on the relative enrollment of private and public school students, on the assumption that these numbers also accurately reflect the relative needs of students and teachers in the public and private schools. The proportionate share of federal funding for private schools is allocated prior to reserving any funds for specific public school uses. Through active consultation between the school district and private school officials, a determination will be made as to whether a private school will receive equitable access to federal programs through an allocation or provision of direct services.

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. This administrative cost is specific to administering the private school programs only, and does not take into account any public school administration needs. Administrative costs must be a topic for consultation and allowability varies from program to program.

### Carryover

ESEA sections 1117(a)(4)(B) and 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.***

As such, the school district will work with the private school officials to obligate and expend all funds for a given fiscal year *no later than 30 days prior to the federal program's grant closure date.* Any supplies, supplemental materials or curriculum, and/or equipment must be received and implemented to benefit the program purpose before the close of the grant period.

If there are extenuating circumstances that prevent a private school from utilizing the funds dedicated under a specific federal program, the school district will submit a request to the FDOE for the funds to carry over in the subsequent school year. Depending on the federal program, carryover funds are not guaranteed and are subject to approval by the FDOE. Carryover requests should only be made after consultation with private school officials.

## Eligible Activities and Program Implementation

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. A brief description of each program’s intended use is included below. Current program-level contacts at the school district can be found on the SCPS website under Departments → Federal Projects and Resource Development.

### **Title I, Part A – Improving the Academic Achievement of the Disadvantaged: Improving Basic Programs Operated by Local Education Agencies (LEAs)**

Title I, Part A provides supplementary instruction and/or resources to students who live in a Title I attendance area and are failing or most at risk of failing to meet high academic standards. Services are also available to the teachers and parents of participating students and may include professional development and family engagement supports and activities.

### **Title II, Part A – Preparing, Training and Recruiting High-Quality Teachers and Principals: Supporting Effective Instruction**

The Teacher and Principal Training and Recruiting Fund provides assistance for preparing, training, recruiting, and retaining high-quality teachers and principals. Private school teachers, principals, and other educational personnel may receive professional development that meets the specific needs of school staff. In general, this grant focuses on professional learning and the recruitment and retention of highly effective teachers and leaders, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet challenging state academic standards. This grant emphasizes the need to ensure that minority and low-income students have greater access to effective teachers, principals and other school leaders.

### **Title III, Part A – Language Instruction for Limited English Proficient and Immigrant Students**

The Language Instruction for Limited English Proficient and Immigrant Students program provides support for English Language Learners (ELLs) to attain English proficiency and meet the academic standards required of all students. Students within private schools who are identified as English learners as well as teachers, principals and other school leaders are eligible to participate in Title III-funded initiatives. The use of funds must be to improve the English language proficiency of identified English learners, educators’ professional knowledge related to working with English learners in their classroom and/or engagement with parents and families of English learners in the private school. Funds may also be directed toward costs related to the assessment of the quality of Title III services rendered to the private school(s).

### **Title IV, Part A – Student Support and Academic Enrichment**

All private school students, their teachers, and other educational personnel serving those children, are eligible to participate in grant-funded supports and activities under the Title IV, Part A Student Support and Academic Enrichment Grant. The grant is intended to help increase districts’ capacity by enhancing the following goals: (1) Provide students with access to a well-rounded education [ESSA section 4107]; (2) Improve safe and healthy school conditions for student learning [ESSA section 4108]; and (3) Improve the use of technology in order to improve the academic achievement and digital literacy of all students [ESSA section 4109].

#### **Title IV, Part B – 21st Century Community Learning Centers**

The 21st Century Community Learning Centers (21st CCLC) program provides before-and after-school services to children and their families, including academic and personal enrichment activities designed to help students meet performance standards in core academic subjects.

#### **IDEA – Individuals with Disabilities Education Act**

IDEA is designed to improve educational results for all students with disabilities. It provides benefits and services to children with disabilities enrolled by their parents in private schools. School districts have an obligation to provide parentally placed private school students with disabilities or home school students with disabilities an opportunity for equitable participation in the services funded with Federal Part B funds that the LEA has determined, after consultation, to make available to parentally placed private school students with disabilities. The amount of Part B funds available for these services is based on the proportionate share calculation.

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

The purpose of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) is to develop more fully the academic knowledge, and technical and employability skills of secondary students enrolled in CTE programs of study and career exploration programs.

## **Record Keeping**

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)). As such, all private school expenditures must comply with the school district's procurement and finance policies and procedures.

To aid with the internal control of private school allocation management, the school district developed a unique "cost center" identifier for each private school within Seminole County. These cost center identifiers will allow the school district to build school-specific budgets for each federal project. For the purpose of record keeping, all procurement and financial records will be assigned to the appropriate private school cost center.

In the event that the school district enters into a contract or services agreement on behalf of a private school, it is acknowledged that the primary responsibility for maintaining documentation is on the school district. It is important, however, to note that the school district will require the private school officials to provide supporting documentation to determine that the expense is allowable, reasonable, defensible and necessary in accordance with applicable federal requirements. Specific documentation and/or deliverables may be requested prior to payment to a vendor (i.e. participant sign-in sheets, an agenda and receipts).

In addition to records of procurement and financial transactions, the school district will maintain documentation of consultation by program staff with private school officials, to include a written affirmation signed by officials of each participating private school that the meaningful consultation has occurred for each applicable federal program. The written affirmation provides the option for private school officials to indicate such officials' belief that timely and meaningful consultation has or has not occurred or that the program design is not equitable with respect to eligible private school children, as required by ESSA Section 8501(c)(5).

## Inventory Control and Equipment

As permissible by each particular federal program, the purchase and use of computers, audio-visual equipment, and other equipment and materials is allowable under equitable services to support the education of eligible students and/or support of nonpublic school teachers. The school district is responsible for monitoring and safeguarding equipment or other durable goods which were purchased with federal funds and reside on a private school campus. This includes both capitalized items (purchase price of more than \$1,000) and/or items considered to be ‘attractive’ (i.e., tablets, small computers), as defined by the school district’s *Standard Operating Procedure: Attractive Items Purchased by State/Federal Grant Funds* (see Appendix).

Private schools seeking to obtain capitalized and/or attractive items through equitable services are required to participate in annual inventory of such items. The school district manages this process in collaboration and coordination with private school leaders. Any school requesting technology equipment must sign and return a Technology Memorandum of Understanding prior to release of items to the private school (see Appendix).

Any equipment or non-consumable supplies provided to private schools through equitable services shall be returned to the district at the conclusion of the project period, unless the equipment or supplies could be repurposed for other federal program activities.

## 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.

For the state of Florida, the following individual serves as the Private Schools Ombudsman:

Nicolle Tanner, Ombudsman  
Florida Department of Education  
Nicolle.tanner@fldoe.org  
850-245-9349

The FDOE Ombudsman for Private Schools manages the process for receiving, investigating and resolving complaints from parents, teachers or other individuals and organizations regarding violations of ESSA, Section 8501, related to equitable provision of services under specific federal programs.

Complaints may be filed directly with the Florida Department of Education. However, if an individual would like to discuss such a complaint with the school district prior to official submission to the FDOE, the Director of Federal Projects and Resource Development may be contacted directly at (407) 320-0382.

## 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/about/inits/ed/non-public-education/files/equitable-services-guidance-100419.pdf>

Florida Department of Education, Private Schools Equitable Services

<http://www.fldoe.org/finance/equitable-services/>

**Appendix:**  
**Equitable Services for Private Schools**  
**Private School Consultation and Program Coordination**  
**Forms and Standard Operating Procedures**



ATTACHMENT A

Seminole County Public Schools
Federal Programs Election to Participate Form

Date:
Private School Name:
Address:
Phone: Email:
Private School Administrator: Title / Name
Federal Programs Contact: Title / Name
Contact Phone: Email:

To obtain more information about federal education programs available, complete the Eligibility and Interest sections below.

I. Eligibility

- a) The school is a nonprofit school (only nonprofit schools may participate). YES NO
b) The school has submitted proof of nonprofit status. YES NO

II. Interest(s)

The school indicated above is interested in participating in the federal programs marked below.
(Note: private school students and teachers may receive benefits, services, and materials from these programs. Private schools do not receive direct funding from the programs. The school district maintains control of the federal funds, as well as any materials, supplies and equipment purchased with federal funds.)

- Title I, Part A Title II, Part A Title III, Part A
Title IV, Part A Title IV, Part B Perkins V
IDEA

Administrator's Signature: Date:
Print Name: Title:

If you elected to participate in any of these programs, the program grant administrator will contact you with further information on program consultation.

Mail, email, or fax this completed document to:
Resource Development
Seminole County Public Schools
400 E. Lake Mary Blvd., Sanford, FL 32773
Email: federal\_projects@scps.us

If you have any questions, please contact Resource Development at (407) 320-0020.

**ATTACHMENT B**

**Affirmation of Federal Programs Consultation with Private Schools  
Seminole County Public Schools**

It is the aim of the school district to engage in timely and meaningful consultation with local private schools to ensure equitable participation of students and teachers in federal programs. As such, the district seeks to develop a plan in collaboration with private school officials that provides equitable and effective programs that benefit eligible private school students, teachers and other education personnel, and families in ESEA programs.

Private School _____	Phone _____
Private School Official _____	Email _____

**Participation in Federal Programs:**

- Title I, Part A       Title II, Part A       Title III, Part A       Title IV, Part A
- Title IV, Part B       IDEA       Perkins V

**Consultation topics, as required by ESSA, Sections 1117(b) and 8501(5)(c):**

- Identification of children’s needs.
- What services will be offered; services including materials and equipment must be secular, neutral, and non-ideological.
- How, where, and by whom the services will be provided.
- How services are assessed and how the results of the assessment will be used to improve those services.
- The size and scope of the equitable services provided to eligible private school children, teachers, and other educational personnel.
- The proportionate share of funding allocated for services and how the funding allocated is determined.
- How and when decisions about delivery of services will be made and how the private school officials will be notified of those decisions.
- Whether services shall be provided by the school district directly or through a separate government agency, consortium, or entity, or through a third-party contractor.
- Whether to provide equitable services to eligible private school children by pooling funds allocated for the program’s purpose.
- What methods or sources of data will be used to determine the number of children from low-income families in participating school attendance areas who attend private schools. (Title I only)
- How, if the public school district disagrees with the views of the private school officials on the provision of services through a contract, the public school district will provide in writing to the private school officials an analysis of the reasons why the district has chosen not to use a contractor. (Title I only)
- When, including approximate time of day, services will be provided. (Title I only)
- Total carryover funds available for the provision of equitable services under the respective program(s) and in determining how carryover funds will be used (ESEA sections 1117(b) and 8501(c)).

**By signing this form, you affirm the following:**

- We agree the complaint process and procedures regarding consultation were explained.
- We agree timely and meaningful consultation occurred and consultation topics required by *ESSA, Section 8501 and Section 1117* were addressed prior to the school district making any decisions that affected the participation of eligible private school students in the program.
- We agree we have participated in meaningful and timely discussion on each federal program and have chosen to participate in the program(s) indicated above.
- We agree timely and meaningful consultation shall continue throughout implementation and assessment of services provided under these federal programs will be ongoing over the duration of the school year.

\_\_\_\_\_  
**PRIVATE SCHOOL AUTHORIZED REPRESENTATIVE SIGNATURE**

\_\_\_\_\_  
DATE

\_\_\_\_\_  
PRINTED NAME / TITLE

\_\_\_\_\_  
**SCHOOL DISTRICT / GRANT ADMINISTRATOR SIGNATURE**

\_\_\_\_\_  
DATE

\_\_\_\_\_  
PRINTED NAME / TITLE

\_\_\_\_\_  
**SCHOOL DISTRICT / FEDERAL PROJECTS DIRECTOR SIGNATURE**

\_\_\_\_\_  
DATE

\_\_\_\_\_  
PRINTED NAME / TITLE

***Check box / sign below ONLY if in disagreement with the school district***

By checking this box and signing below you are indicating that you believe the timely and meaningful consultation HAS NOT occurred or the program design is NOT EQUITABLE with respect to eligible private school students, teachers and other education personnel, and/or families.

*If you check this box, please attach a statement of explanation of why consultation was not timely and meaningful, and/or why the program design is not equitable.*

\_\_\_\_\_  
PRIVATE SCHOOL AUTHORIZED REPRESENTATIVE SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
PRINTED NAME / TITLE

**ATTACHMENT C**  
*Equitable Services Roll Forward Consultation Form*

**Equitable Services Roll Forward Consultation: [Program Name & Year]**

Private School:  
Private School Contact:  
Estimated Unexpended Balance:

Date of Consultation:  
District Program Contact:

Description of activities that either did not occur or cost less than originally budgeted which led to private school having unexpended funds:

During the consultation, the school district offered the following services and/or assistance to the private school to fully expend their allocation within the year for which they were appropriated:

- The private school agrees to utilize the services and/or assistance offered by the district to fully expend its allocation within the required timeframe.
- The private school acknowledges that services and/or assistance were offered by the district to fully expend its allocation, but those services/assistance will not be utilized; therefore, the private school will have an unexpended funds that will be rolled forward for both public and private school in the following year.
- The district agrees that a circumstance occurred in which not all funds allocated to the private school could be obligated with the required timeframe; therefore, the unexpended funds will roll forward to the affected school if they elect to participate in the Federal program in the following year.

Private School Contact Signature: \_\_\_\_\_

District Program Contact Signature: \_\_\_\_\_

**ATTACHMENT D**

*Attractive Items Purchased by State/Federal Grant Funds*

## Standard Operating Procedure: Attractive Items Purchased by State/Federal Grant Funds

### Purpose

The purpose of this document is to establish procedures for safeguarding small attractive items that are not otherwise captured by the Property Records Department inventory process, but which are required to be safeguarded per guidance in the Florida Department of Education *Green Book: Project Application and Amendment Procedures for Federal and State Programs* (FLDOE Green Book). This procedure defines “Small Attractive Item” and identifies the Grant Administrator as the party responsible for identifying, recording, and tracking Small Attractive Items purchased with Federal and State program funding through their life cycle.

### Background and References

Equipment or other durable goods (tangible personal property) can be purchased using Federal or State Program funding. Grant Administrators whose programs purchase tangible personal property should be familiar with the following Board policies, which broadly address the District’s requirements for safeguarding tangible personal property regardless of funding source:

- Policy po7300: Property Custodianship
- Policy po7310: Disposition of Surplus Property
- Policy po7450: Inventory
- Policy po7455: Capital Asset System

In general, Board policies require the proper safeguarding and annual inventorying of all district-owned tangible personal property of a non-consumable nature, with a life expectancy of one year or more, and an acquisition cost (capitalized threshold) equal to or greater than the value defined in statute.<sup>i</sup>

In addition, Section 200.313 (and Section 200.439) of Part 200, *Uniform Administrative Requirements, Costs Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), provides guidance specific to the use, management, maintenance, and disposal of equipment purchased with Federal funds. This guidance defines equipment as tangible personal property having a useful life of more than one year and an acquisition cost which exceeds the District’s capitalization level.

The FLDOE Green Book also addresses requirements for property purchased with Federal and State program funds. The Green Book provides additional guidelines for certain tangible personal property that does not meet the District’s capitalization threshold. It states: “Small attractive items with a purchase value less than the District’s capitalization threshold, whether classified as equipment, technological item or supplies must be safeguarded.”

The District’s Property Records Department records, tracks, and annually inventories tangible personal property that has a useful life of more than one year and a cost (capitalization threshold) of more than \$1,000. Items under the District’s capitalization threshold are not within the scope of the District’s Property Records Department procedures. To ensure that Green Book requirements for “Small Attractive Items” are met, the procedures listed below shall be followed.

### Procedures

**Identifying Small Attractive Items.** FLDOE Green Book does not define “Small Attractive Items.” For purposes of this procedure, the following definition should be used. Small Attractive Items are tangible personal property that meet all of the following criteria:

- Have a per-unit acquisition cost of at least \$100 but less than \$1,000
- Have an expected useful life of one year or more

## Standard Operating Procedure: Attractive Items Purchased by State/Federal Grant Funds

- Are prone to theft or loss due to their portable nature (i.e., easily removed from a school site or district facility) and the probability that the item might be appropriated for personal use or gain, to include potential profit from resale

Common examples of Small Attractive Items include computers (i.e., tablets, laptops), portable printers, scanners or projectors, audiovisual equipment, and cameras.

School Board policy 7300 assigns responsibility for safe custody of property to the principal or cost center administrator. For property purchased with state or federal grant funds, the Grant Administrator holds the ultimate responsibility for this property. Therefore, the Grant Administrator is responsible for identifying Small Attractive Items subject to this procedure.

When assessing the risk of theft for specific property purchased with state or federal grant funds, the Grant Administrator shall consider the item type, portability of the item, attractiveness of the item (i.e., new technology, greater value, adaptability for personal use), and the accessibility of the item to others.

**Small Attractive Item Management.** Since Small Attractive Items have acquisition costs of less than the District’s capitalization threshold of \$1,000, the District’s policy for an annual inventory process does not apply. Once a small item with a cost between \$100 and \$1,000 is determined to be “attractive,” the following procedure shall be followed by the Grant Administrator.

- Use the “Attractive Item Tracker” to record initial information regarding the property:  
*Description of the property, acquisition date, purchase order number, cost, source of the funding for the item (i.e., award identification number found on the Project Award Notification under “Authority”), serial number (if applicable), internal tracking number (from barcode), location, and condition of the property.*
- Label the item with “Property of SCPS”, along with a tracking barcode. [See instructions on creating a barcode.]
- On an annual basis, inventory shall be taken of all attractive items using the “Attractive Item Tracker”. The Grant Administrator or delegate will physically locate the item and verify the property tag, accuracy of the location, and condition of item.

**Disposal of Small Attractive Items.** Per School Board policy po7450, Property Inventory, disposal of property purchased by a federal award (including state pass-through) will follow the awarding agency process and comply with C.F.R. 200.313. If an item is determined to be lost or stolen, the Grant Administrator will follow the appropriate procedure for reporting lost or stolen items. If an item is determined to be obsolete or damaged beyond repair, the Grant Administrator will follow School Board policy po7310 and the appropriate district procedure for surplus of a state or federally funded item. In either of these scenarios, the outcome will be recorded on the Attractive Item Tracker. *In no situation will an item be deleted from the tracker.*

Procedure Note: This procedure applies to items purchased for the purpose of public or private school uses; to include traditional and charter school programs.

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<sup>1</sup> This minimum value is established in Florida Statutes, specifically Florida Administrative Rule 69I-73.002 “Threshold for Recording Property.”

**ATTACHMENT E**  
*Technology Memorandum of Understanding*



## Memorandum of Understanding Regarding Purchases

The following list of assurances represents an agreement between \_\_\_\_\_ (“School”) and Seminole County Public Schools regarding the purchase and use of computers, audio-visual equipment, and other equipment and materials purchased with federal funds to support the education of eligible students and/or support of nonpublic school teachers. This agreement pertains to items with a purchase price of \$1,000.00 or more (or a lesser amount, if computers) and/or items considered to be ‘attractive’ (i.e. tablets).

### School will:

1. Sign this agreement before any purchases are made.
2. Certify that the equipment will be used only for the purposes outlined in the agreed upon service delivery plan.
3. Certify that all purchases will remain the property of Seminole County Public Schools and 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, and/or at the close of the project period, as applicable by grant program.
4. Ensure that when not in use, the equipment will be stored in a safe and secure area and that storage location has been reported to the district representative (below).

Jamee Minnetto – (407) 320-0382; [jamee\\_minnetto@scps.k12.fl.us](mailto:jamee_minnetto@scps.k12.fl.us)

5. Ensure that property tags are not marred or otherwise disfigured. If replacement tags are needed, the school will contact the district representative immediately.
6. Ensure that if a piece of equipment is stolen, a report will be filed with the local police department immediately. A copy of the police report will be sent to the district representative. No further obligation will be required of the school.
7. Ensure that in the case of damage to a piece of equipment, the school notifies the district representative immediately, to include a description of the damage and cause.
8. In cases where equipment damage is to warrantied technology, such as laptops, district-provided protocols to have the device repaired or replaced, if the warranty is still valid, will be followed. If warranty is no longer valid, technology shall be returned to the district, with no further obligation from the school.
9. Maintain an updated inventory of all equipment purchased with federal funds and be responsible for knowing the location at all times.
10. Provide SCPS an updated inventory of equipment purchased with federal funds. Inventory shall be provided annually and no later than June 15 of each year.

**Seminole County Public Schools will:**

1. Review all purchase requests for legality and adherence to the intent of the law and federal guidelines.
2. Place requested orders with district-approved vendors.
3. Install property tags on every item with a purchase price of \$1,000 or more (or a lesser amount, if computers).
4. Verify school-submitted inventory through on-site visits to the school on a regular schedule.
5. Upon closure of a project, work with private school leaders to determine if equipment, non-consumable supplies, and/or "attractive" items may be repurposed for other federal program activities.
6. Catalogue release and return of any equipment, non-consumable supplies, and/or "attractive" items received from school.

\_\_\_\_\_  
School Principal or Designee

\_\_\_\_\_  
Date

\_\_\_\_\_  
District Administrator

\_\_\_\_\_  
Date

**ATTACHMENT F**  
*Professional Development Pre-Approval Request Form*



SEMINOLE COUNTY PUBLIC SCHOOLS, FLORIDA

EQUITABLE SERVICES PROFESSIONAL DEVELOPMENT  
PRE-APPROVAL REQUEST FORM

Name: \_\_\_\_\_ Position: \_\_\_\_\_

School/Department \_\_\_\_\_ Date Submitted: \_\_\_\_\_

Type of Program (check one):  
Conference \_\_\_\_\_ Workshop \_\_\_\_\_ Convention \_\_\_\_\_

Title of Program: \_\_\_\_\_

Institution offering program: \_\_\_\_\_

Location (city and state) \_\_\_\_\_

Beginning Date/Time \_\_\_\_\_ Ending Date/Time \_\_\_\_\_

Registration Method/Link: \_\_\_\_\_

Funds Requested	Amount	Funding Source (Title I, Title II, Title III, Title IV)
*Registration Fee		
Airfare		
Hotel		
Meals		
Parking		
Tolls/Transportation		
Mileage (Reimb@\$0.56)		
TOTAL Funds \$		

\*Please submit request 30 days prior to travel date. All requests to use Federal Grant Funds must be pre-approved prior to workshop, conference and convention or for all materials to be purchased. Attach completed registration form and details or detailed quote on materials to be purchased.

Traveler's Signature \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor's Signature \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_

<b>Professional Development Use Only</b>	
District Project Manager _____ (Signature)	Date: _____