



Equitable Services for Private School Students and Teachers

Under the Elementary and Secondary Education Act (ESEA)
as amended by the Every Student Succeeds Act (ESSA)

CALIFORNIA DEPARTMENT OF EDUCATION

Tony Thurmond, State Superintendent of Public Instruction



Webinar Agenda

- ❑ Overview of Private School Consultation

- ❑ Overview of Equitable Services for Private School Students and Teachers under:
 - Title I, Part A (Improving Basic Programs)
 - Title I, Part C (Migrant Education)
 - Title II, Part A (Supporting Effective Instruction)
 - Title III, Part A (English Language Acquisition)
 - Title IV, Part A (Student Support & Academic Enrichment)
 - Title IV, Part B (21st Century Community Learning Centers)



Private School Consultation

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What is Private School Consultation?

To ensure timely and meaningful consultation, a local educational agency (LEA) must consult with appropriate private school officials during the design and development of the LEA's programs.

ESSA sections 1117(b) and 8501(c)



Timely and Meaningful Consultation

- ✓ Effective consultation provides a genuine opportunity for all parties to express their views and to have those views considered.
- ✓ Successful consultation establishes positive and productive working relationships.
- ✓ Consultation continues throughout implementation of equitable services.
- ✓ A unilateral offer of services by an LEA with no opportunity for discussion, or the application of a blanket rule, is not adequate consultation.





Consultation Requirement

- **Goal of consultation is to reach agreement between the LEA and the appropriate private school officials on how to provide equitable and effective programs for eligible private school children.**
 - The results of the consultation will be submitted by the LEAs in the Spring through the California Department of Education (CDE) Consolidated Application and Reporting System (CARS).



LEAs are required to:

Consult with private schools

Determine the proportional share for equitable services

Provide equitable services to eligible students and staff

Offer secular, neutral, and non-ideological services



Private schools may assist this process by:

Participating and having the goal of reaching agreement in the ongoing consultation with the LEA

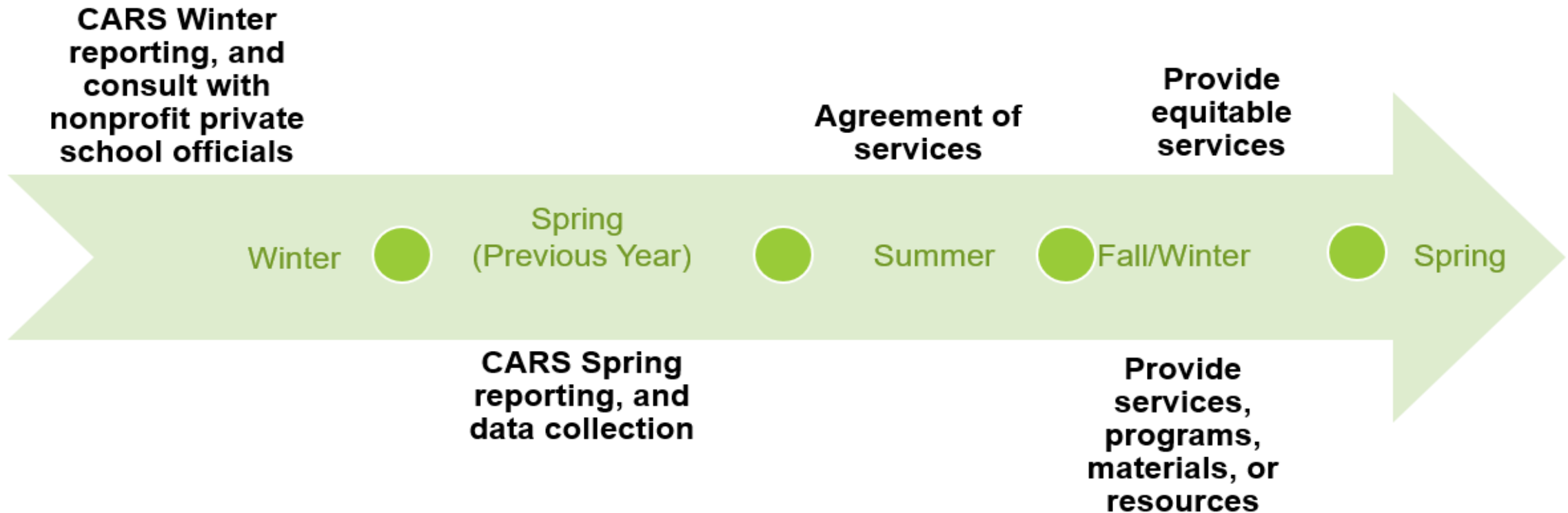
Responding to the LEAs request for information

Providing documentation on the needs of students and educators

Allowing the assessment of student achievement



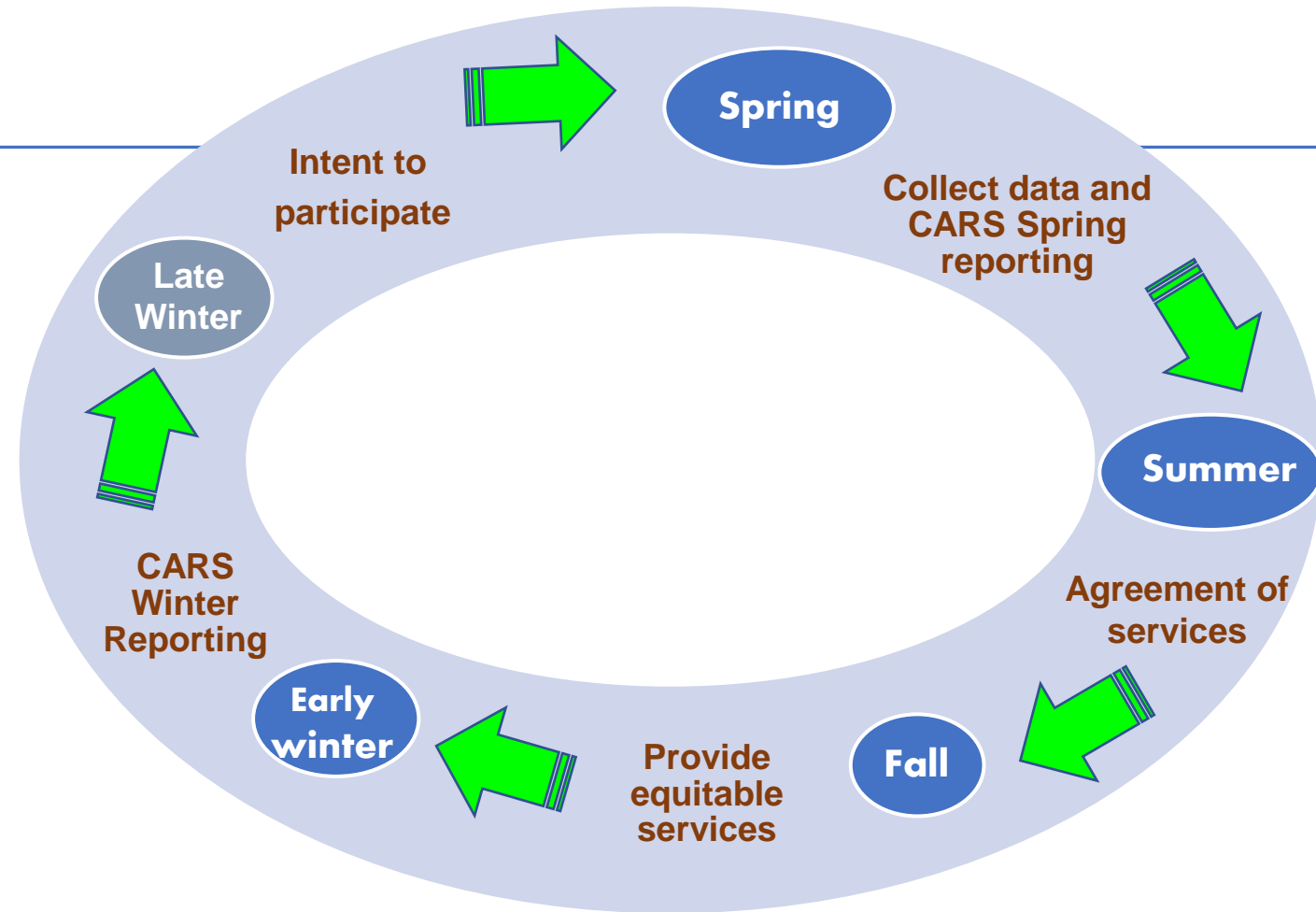
Suggested Consultation Timeline





A Different View of A Suggested Documentation Timeline

- ✓ Intent to Participate
- ✓ Consultation Results
- ✓ Written Affirmation
- ✓ Contract of Services
- ✓ Assessment of Services
- ✓ Allocation of Funds





Funding versus Services

- Under the ESSA, no funds may be paid directly to the private school.
- LEAs determine the proportion of funds to be allocated for equitable services to participating private schools.
- Services are determined during consultation based on assessment results and students identified needs.
- Curriculum, equipment, and other materials purchased to implement this program are the property of the LEA.



Obligation of Funds



- Funds allocated to the LEA for educational services and other benefits to eligible private school children must be obligated in the fiscal year for which the funds are received by the LEA.

ESSA sections 1117 and 8501(a)(4)(B)

Federal
Fiscal
Year



Provision of Services

- The provision of services must be provided either:
 - (i) by employees of the LEA; or
 - (ii) through a 3rd party contract by the LEA with an individual, association, agency, or organization.

ESSA sections 1117 and 8501(d)(2)(A)



Third Party Contract

- If during consultation, it is decided a third-party contractor is to be used, the contract is between the **LEA** and the **contractor**.
- All contracts must be under the control and supervision of the LEA.
- The third-party contractor must be independent of the private school, and of any religious organization.

ESSA sections 1117 and 8501(d)(2)(B)

QUESTIONS



Equitable Services Consultation Contact

Sylvia Hanna

Education Programs Consultant

Equitable Services State Ombudsman

Title I Policy, Program, and Support Office

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Title I, Part A Improving Basic Programs

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Title I, Part A Eligibility for Services

- ✓ Students not older than age 21 who are entitled to a free public education through grade 12.
- ✓ Students identified as failing, or most at risk of failing.
- ✓ Students must reside in the LEA's participating school attendance area and must be enrolled in any nonprofit private elementary or secondary school.
- ✓ Students included may be economically disadvantaged, students with disabilities, migrant students or English learners (ELs).



Title I, Part A Proportion of Funds

- The proportional share of funds shall be determined based on the total amount of funds received by the LEA prior to any allowable expenditures or transfers.
- The proportional share calculation is based on the number of children from low-income families who attend participating nonprofit private schools.
- The LEA has the final authority to calculate the number of children **ages 5 through 17** from low-income families and attending nonprofit private schools



Nonprofit Private School Low-income Count Rate

- Example of calculating nonprofit private school low-income count rate:
 - Total public school low-income count: **1,350**
 - Total participating nonprofit private school low-income count: **150**
 - Total public schools and participating nonprofit private school low-income count: **1,500**
 - Percentage of nonprofit private school low-income count rate: **$150/1500=10\%$**



Title I, Part A Equitable Services Reservations

- Parent and Family Engagement (Required)
- Administrative costs (Allowable)
- Indirect costs (Allowable)
- Other reservations (Allowable)





Title I, Part A Authorized Use of Funds

Title I, Part A Authorized Use of Funds

Title I, Part A federal funds help to meet the educational needs of students in California.

The California Department of Education (CDE) recommends that local educational agencies (LEAs), County Offices of Education, and direct funded charter schools should consider the following general criteria when approving activities or expenditures supported with Title I, Part A funds:

1. The activity/expenditure is aligned to meet the challenging State academic content standards [Every Student Succeeds Act (ESSA) Section 1112(a)(3)(B)(i) and ESSA Section 1112(b)];
2. The activity/expenditure is an evidenced-based educational strategy (ESSA Section 1003[b][1][B], ESSA Section 1114[d], and ESSA Section 1115[h]);
3. The activity/expenditure is reasonable, necessary, and allocable cost to the program (2 CFR 200.404 - 200.405);
4. Title I, Part A funds used supplement the funds that would, in the absence of such funds, be made available from State and local sources, and does not supplant such funds (ESSA Section 1118[b][1]);
5. Title I, Part A funds used are current Federal fiscal year or the subsequent fiscal year (ESSA Section 1127[a]).

Title I schools should consider the following general criteria when approving activities or expenditures supported with Title I, Part A funds:

6. The activity/expenditure meets a need identified in the comprehensive needs assessment for Schoolwide Program (SWP) Schools (ESSA Section 1114[b][6]);
7. The activity/expenditure is included in the Single Plan for Student Achievement (SPSA) [EC 52853(a)(6)-(7) and EC 64001(f)-(g)];
8. The SPSA has been approved by the local governing board [EC 52855 and EC 64001(g)-(h)];
9. The SPSA annually evaluates progress toward accomplishing goals [EC 64001(f)], and
10. The activity/expenditure has been reviewed, approved, and recommended by the Schoolsite Council to the local governing board [EC 52853(b), EC 52855, and EC 64001(a)].

If an LEA or school has not successfully completed all of the above rationale, it is not likely to be an authorized use of Title I, Part A funds.

<https://www.cde.ca.gov/sp/sw/t1/authuseoffunds.asp>



Examples of Title I, Part A Services and Allowable Activities

Saturday
Tutoring

Small Group
Remediation

Virtual
Learning
Opportunities

Family Literacy
Night

Professional
Development

❖ **Must be secular, neutral, non-ideological**



Title I, Part A Frequently Asked Questions



Frequently Asked Questions (1)

1. May an LEA set a deadline for private school officials to indicate their intent to participate?

- Yes. An LEA may set a reasonable deadline, taking into consideration private school schedules, for private school officials to indicate their intent to participate. An LEA should provide clear and sufficient notice of the deadline, identify potential consequences for not meeting the deadline, and give adequate time for private school officials to respond.



Frequently Asked Questions (2)

2. How does an LEA determine which private schools to contact?

- An LEA has a responsibility to contact all private schools within the district that might have students eligible to participate in Title I programs — i.e., students who live in a participating Title I public school attendance area in the LEA.
- An LEA also has a responsibility to contact private schools outside the district if the LEA has reason to believe students who reside in a participating Title I public school attendance area attend those schools.



Frequently Asked Questions (3)

3. Is there a specific time by which an LEA must obtain the signature of appropriate private school officials regarding written affirmation/results of agreement?

- No. The affirmation of consultation and results of agreement documents are generally signed when consultation on the planning and design of the next year's program has been completed, so long as the LEA had adequate opportunity to engage in timely and meaningful consultation.



Frequently Asked Questions (4)

4. What does it mean for an LEA to determine the proportional share of Title I funds available for equitable services based on the total amount of Title I funds received by the LEA prior to any allowable expenditures or transfers of funds?

- An LEA must apply the proportion used to calculate the proportional share to its entire Title I allocation (including any Title II, Part A or Title IV, Part A funds that an LEA transfers into Title I, Part A) before it reserves any funds for other purposes, including all reservations the ESEA requires or authorizes an LEA to take off the top of its Title I allocation, such as reservations for administration, parent and family engagement, children in institutions for neglected or delinquent children, homeless children and youth, and district-wide initiatives.



Frequently Asked Questions (5)

5. How long does an LEA have to meet the obligation of funds requirement?

- The applicable fiscal year is the Federal fiscal year, which ends on **September 30 of each year**. Although the State may operate on a different fiscal year (e.g., July 1 through June 30), September 30 is the date by which an LEA must obligate funds for equitable services. For example, with respect to fiscal year 2022 Title I funds that an LEA received for the 2022-2023 school year, the LEA must obligate all the funds generated for equitable services by September 30, 2023.





Title I, Part A Contact

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QUESTIONS



Title I, Part C

CALIFORNIA DEPARTMENT OF EDUCATION

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Title I, Part C

Education of Migratory Children

The California Department of Education (CDE) provides subgrants to eligible Migrant Education Program (MEP) regions and districts, as determined by the State Board of Education. These subgrants are used to provide supplemental instructional and support services for eligible migrant students.

Funding is provided to each MEP subgrantee based on a standardized formula.

Title I, Part C

Eligibility for Services

Students ages 3 to 21 (without a high school diploma) who have been identified as eligible for the MEP by the local MEP region or local educational agency (LEA).

The participating nonprofit private schools must be located within the geographic area served by the local MEP region or LEA.

Title I, Part C and Nonprofit Private Schools

The CDE, MEP regions and MEP LEAs assist participating nonprofit private schools in identifying eligible migrant students.

MEP regions and LEAs follow federal guidance in the identification and recruitment of migrant students; therefore, MEP-funded subgrantees are the only entities that identify eligible migrant children.

Title I, Part C and Nonprofit Private Schools (Cont.)

Identified migrant students in nonprofit private schools receive MEP equitable services through respective MEP LEAs.

MEP LEAs may not allocate MEP funds directly to nonprofit private schools. Instead, MEP LEAs must provide services and benefits to eligible migrant students enrolled in the nonprofit private schools.

Title I, Part C

Authorized Use of Funds

Funds are used to provide targeted **supplemental services** for migrant students.

MEP services are prioritized by the unique needs of migrant children. Student needs, and strategies to address those needs, are outlined in the MEP State Service Delivery Plan available on the CDE Migrant web page at <https://www.cde.ca.gov/sp/me/mt/>.

Examples of Title I, Part C Services and Allowable Activities

After School
Interventions

Health
Services

Parent
Workshops

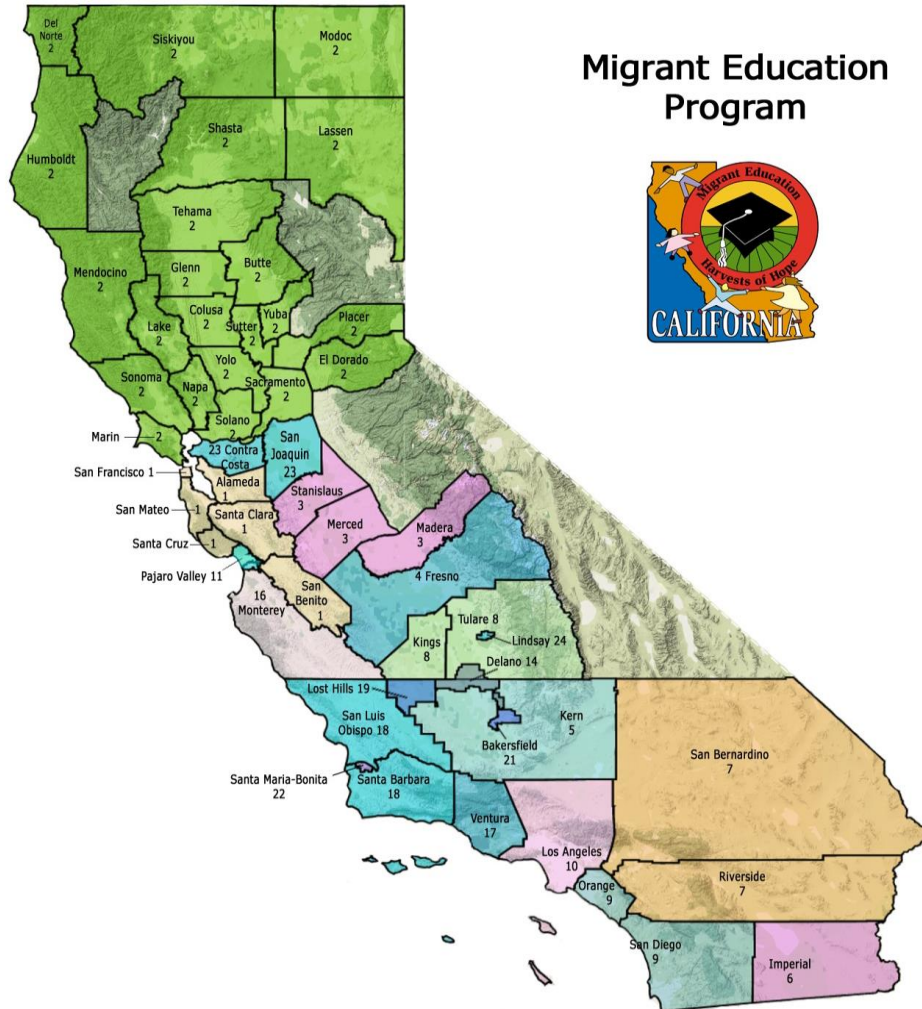
College/
Career
Readiness

Preschool
Services

Professional
Development

❖ **Must be secular, neutral, non-ideological.**

Migrant Programs and Contacts



Subgrantee	Migrant Programs	Contact
1	Santa Clara County Office of Education	408-453-6759
2	Butte County Office of Education	707-815-3808
3	Merced County Office of Education	209-381-6702
4	Fresno County Superintendent of Schools	559-497-3816
5	Kern County Superintendent of Schools	661-636-4779
6	Imperial County Office of Education	760-312-6448
7	Riverside County Office of Education	760-863-3363
8	Tulare County Office of Education	559-651-3035
9	San Diego County Office of Education	858-295-8832
10	Los Angeles County Office of Education	562-992-6164
11	Pajaro Valley Unified School District	831-786-2150
14	Delano Joint Union High School District	661-720-4165
16	Monterey County Office of Education	831-755-6402
17	Ventura County Office of Education	805-383-9359
18	San Luis Obispo County Office of Education	805-922-0788
19	Lost Hills Unified School District	661-797-3035
21	Bakersfield City School District	661-631-4756
22	Santa Maria-Bonita School District	805-361-8217
23	San Joaquin County Office of Education	209-468-9200
24	Lindsay Unified School District	559-562-1703

Title I, Part C Contact

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QUESTIONS



Title II, Part A State – Level

Supporting Effective Instruction

CALIFORNIA DEPARTMENT OF EDUCATION

Tony Thurmond, State Superintendent of Public Instruction



Equitable Services Under the ESEA

- Under the ESEA, the State Educational Agency (SEA) has the responsibility to implement equitable services for qualified nonprofit private school teachers and administrators to the extent that it reserves any funds under the ESEA Section 2101(c)(1) for any of the state-level activities authorized in sections 2101(c)(3)-(4).
- State-level activities in which qualified nonprofit private school teachers and administrators may participate must be determined in consultation between the SEA and appropriate private school officials under **ESEA Section 8501(c)**.



State Level Equitable Services

State Budget Release

SEA (CDE)

Local Consultation

Data Analysis

Contract for PD Services Based on Data

Collaboration with Contractors on Offerings



State Level Local Consultation Meetings

- ✓ Consultation offered throughout the year
- ✓ In-person consultation in 2018
- ✓ Consultation continued in a virtual format



State-Level Professional Learning Opportunities

- ✓ Private School Conference August 2–4, 2023.
- ✓ In person and virtual professional learning opportunities offered throughout the year.
- ✓ Private School Listserv to share other free professional learning opportunities.
- ✓ New professional learning management system offering full access to professional learning videos and resources.



State-Level Resources for LEAs

California Private Schools Professional Development (PD)

website: www.capspdnow.com

CDE Private Schools and Schooling at Home web

page: <https://www.cde.ca.gov/sp/ps/>

Nonprofit Private Schools Equitable Services PD web page:

join-private-school-professional-development@mlist.cde.ca.gov

QUESTIONS



Title II, Part A

Local Educational Agency – Level

Supporting Effective Instruction

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Tony Thurmond, State Superintendent of Public Instruction

Purpose of Every Student Succeeds Act Title II, Part A

1. Increasing student achievement consistent with the challenging state academic standards.
2. Improving the quality and effectiveness of teachers, principals, and other school leaders.
3. Increasing the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools.
4. Providing low-income and minority students greater access to effective teachers, principals, and other school leaders.

Eligibility for Services

- Is based on the number of eligible students who are enrolled in private elementary schools and secondary schools in the geographical areas served by the local educational agency (LEA)
- Is only available to private schools within the LEA boundaries

ESSA Section 8501(c)(1)(H) (20 *United States Code* [U.S.C.] 7881)

Allocations and Calculating Proportion of Funds

- The equitable services allocation for Title II, Part A must be calculated on the basis of the LEA's total Title II, Part A allocation.
- Indirect and administrative costs are taken “off the top.”
- The LEA's equitable services allocation is determined by first calculating the amount of Title II, Part A funds available on a per-pupil basis, based on the total of all public and private school students (enrolled in participating private elementary and secondary schools), in areas served by the LEA, regardless of a student's residency.
- This amount is then multiplied by the number of students enrolled in participating private schools.

Calculating Proportion of Funds

EXAMPLE OF FORMULA TO DETERMINE AMOUNT FOR TITLE II, PART A EQUITABLE EXPENDITURES	
A. Number of Students	
A1: LEA Enrollment	900
A2: Participating Private Schools Enrollment	100
A3: Total Enrollment = $A1 + A2$	1,000
B. Title II, Part A Allocation	
B1: Total LEA Allocation	\$1,000,000
B2: Administrative Costs (for public and private school programs)	\$50,000
B3: LEA Allocation Minus Admin Costs = $B1 - B2$	\$950,000
C. Per Pupil Rate	
C1: B3 divided by A3	\$950
D. Equitable Services	
Amount LEA must reserve for equitable services for private school teachers and other educational personnel = $A2 \times C1$	\$95,000



Title II, Part A Frequently Asked Questions



Equitable Services Uses of Funds— Professional Learning Activities (1)

Question: What types of private school professional learning activities may an LEA pay for using Title II, Part A equitable services funding?

- Improving the knowledge of teachers, principals, and other educational personnel in core academic subjects and in effective instructional teaching strategies, methods, and skills;
- Training in effectively integrating technology into curricula and instruction;
- Training in how to teach students with different needs, including students with disabilities or limited English proficiency, and gifted and talented students;
- Training in methods of improving student behavior, identifying early and appropriate interventions, and involving parents more effectively in their children's education;

ESSA Section 2103 (20 U.S.C. 6613)



Equitable Services Uses of Funds— Professional Learning Activities (2)

Question: Do conferences meet the definition of “professional development” in ESSA section 8101(42) (20 U.S.C. 7801)?

- Professional development services and programs must meet the definition of “professional development” in ESSA section 8101(42) (20 U.S.C. 7801), which requires that the activity is both (1) part of the strategies for providing educators with the knowledge and skills necessary to enable children to succeed in a well-rounded education and (2) “sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, driven, and classroom focused.”



Equitable Services Uses of Funds— Professional Learning Activities (3)

- If a private school official can demonstrate, through consultation with an LEA, that attendance at a short-term conference is part of a sustained and comprehensive professional development plan for a teacher that meets these Title II, Part A requirements, including the statutory definition of professional development, then an LEA may use Title II, Part A funds for costs associated with a private school teacher's participation in the conference.



Equitable Services Uses of Funds— Professional Learning Activities (4)

Question: May Title II, Part A equitable services funding be used to pay for private school teachers to attend a professional conference sponsored or conducted by a faith-based organization?

- Yes. To the extent that the conference is part of a sustained and comprehensive secular professional development plan for the teacher, then Title II, Part A funds may be expended to pay for the portion of the costs of the conference that, as determined by the LEA, represent the secular professional development in which the teacher participated.
- In this case, the LEA would pay or reimburse the teacher for the secular portion of their attendance at the conference.
- Equitable Services must be secular, neutral, and non-ideological.



Equitable Services Uses of Funds— Professional Learning Activities (5)

Question: May Title II, Part A equitable services funding be used to pay for substitute teachers while private school teachers attend professional development?

- No, private school substitutes are not an allowable use of funds.
- Title II, Part A funds may be used to pay for stipends for private school teachers, as reasonable and necessary. For example, if the professional development activity is conducted during after-school hours or in the summer, stipends may be needed to compensate teachers for their participation outside their regular employment hours. Stipends for private school teachers must be available on the same basis as those for public school teachers and the stipends must be paid directly to the private school teachers for their own use, and not to the private school.



Equitable Services Uses of Funds— Professional Learning Activities (6)

Please use the link below for Title II, Part A uses of funds.

ESSA Section 2103 ([20 U.S.C. 6613 Local uses of funds \[house.gov\]](#))

Resources

ESSA web page can be found at

<https://www.cde.ca.gov/re/es/>.

Title II, Part A Equitable Services web page can be found at

<https://www.cde.ca.gov/pd/ti/tiiaprivateschools.asp>.

Private Schools and Schooling at Home web page can be found at <https://www.cde.ca.gov/sp/ps/>.

Private School Resources web page can be found at <https://www.cde.ca.gov/sp/ps/resources.asp>.



Contact Us

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LEA-Level Title II Equitable Services

Teacher and Leader Policy Office

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State-Level Title II Equitable Services

QUESTIONS



Title III, Part A

English Language Acquisition

CALIFORNIA DEPARTMENT OF EDUCATION

Tony Thurmond, State Superintendent of Public Instruction



Title III, Part A

Private School Participation

- Private schools are not eligible to receive Title III funds directly.
- The LEA conducts timely and meaningful consultation.
- EL and immigrant students are identified.
- Nonprofit private schools may receive Title III services and products for identified students.
- Provided by participating LEAs to private schools in their geographical jurisdiction.



Title III, Part A

Private School Eligibility

➤ Eligibility:

- Students aged 3 to 21.
- The nonprofit private school is located within the geographic area served by the LEA.
- The LEA is also participating in Title III programs.
- LEAs assist in identification and initial assessment of eligible students.



Title III, Part A Program Identification of EL Students

- EL students, are identified by the private school:
 - Home Language Survey (HLS) is given to all students in the private school when first enrolled.
 - The LEA assesses the students for whom there is a language other than English identified on the HLS.
 - The LEA and the private school agree on the assessment used, and the time and date for assessing students.



Title III, Part A Program Identification of Immigrant Students

- The private school completes the Student National Origin Report (SNOR).
- Private schools must submit the SNOR to the CDE.
- Eligible students are those that:
 - Are ages 3 to 21.
 - Have been in a U.S. school for less than 36 months, cumulatively.
 - Were born in a country outside of the U.S., or U.S. territories.
- Private schools indicate to the CDE their intent to participate.



Title III, Part A Programs Providing Equitable Services

- ✓ Through consultation, LEAs and private schools develop a Memorandum of Understanding (MOU).
- ✓ The MOU describes the services and/or products to be provided, the estimated costs, and the dates when will be provided.
- ✓ LEAs may not allocate Title III funds directly to private schools.
- ✓ LEAs provide services and products (**equitable to those services provided to students in the public school**) for eligible EL/immigrant students enrolled in participating private schools.



Title III, Part A

Proportional Share

- LEAs receive a per-pupil allocation for each eligible EL and immigrant student enrolled in the LEA. The LEA also receives same per-pupil allocation for each eligible EL and immigrant student enrolled in nonprofit private schools in the geographic area served by the LEA.
- Equitable services provided to private schools should be proportionate to:
 - the number of EL and/or immigrant students enrolled in the private school, and
 - should be equitable when compared to the Title III services provided to public school students.



Title III, Part A

Authorized Use of Funds

- Funds are used to provide supplemental language instructional services for EL and support for immigrant students.
- Participating private schools should be familiar with:
 - The general purposes of each Title III program;
 - The required and allowable activities; and
 - The description of the services and/or products in the MOU, the estimated costs, and the dates they will be provided.



Examples of Title III, Part A Services

Assessing EL Students

Shared Resources

Small Group Instruction

Professional Development

Before/After School Tutoring

Parent and family outreach

❖ **Must be secular, neutral, non-ideological**



Available Resources

CDE's Equitable Services Ombudsman web page:

<https://www.cde.ca.gov/sp/sw/t1/ombudsmaneqservices.asp>

CDE's Title III EL Student Program Private Schools web page:

<https://www.cde.ca.gov/sp/el/t3/elprivateschools.asp>

CDE's Student National Origin Report web page:

<https://www.cde.ca.gov/sp/el/t3/snor.asp>

CDE's Title III Authorized Cost web page:

<https://www.cde.ca.gov/sp/el/t3/authorizedcosts.asp>

CDE's Title III FAQs web page:

<https://www.cde.ca.gov/sp/el/t3/title3faq.asp>



Title III, Part A Contact

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QUESTIONS



Title IV, Part A Student Support & Academic Enrichment

CALIFORNIA DEPARTMENT OF EDUCATION

Tony Thurmond, State Superintendent of Public Instruction



Title IV, Part A Overview

- The purpose of Title IV, Part A is to improve students' academic achievement by increasing the capacity of states, LEAs, schools, and local communities to:
 1. Provide all students with access to a well-rounded education;
 2. Improve school conditions for student learning; and
 3. Improve the use of technology in order to improve the academic achievement and digital literacy of all students (ESSA Section 4101).



Needs Assessment (1)

- ✓ Required if the LEA Allocation is \$30,000 or more;
- ✓ Must be completed prior to receiving the LEA allocation;
and
- ✓ Must be completed at least once every three years
(ESSA Section 4106[d]).



Needs Assessment (2)

- ✓ Identify needs of non-profit private school children, teachers, and other educational personnel
- ✓ Select Relevant, Evidence-Based Activities
- ✓ Plan for Implementation
- ✓ Implement Activities
- ✓ Examine and Reflect on Results

ESSA Section 4101



Needs Assessment (3)

- Each non-profit private school or consortium of schools needs to conduct their own needs assessment for their school and it shall be discussed during consultation. However, it is the LEAs program and all determined services will be the authority and responsibility of the LEA.
- The Needs Assessment is conducted in partnership with the non-profit private school.



Title IV, Part A Equitable Services (1)

- The LEA must reserve funds for Title IV, Part A equitable services based on the total enrollment of nonprofit private and public school students **within** the LEA boundary area in order to establish a Per Pupil Allocation.

ESSA Section 4106(e)(2)(B)



Title IV, Part A Equitable Services (2)

- The proportional share calculation is based on a Per Pupil Allocation;
- Equitable services must be provided during the fiscal year in which funds are obligated; and
- The administrative and indirect costs may be calculated prior to the proportional share reservation.



Title IV, Part A Proportional Share Calculation

Step 1

$$\text{LEA Allocation} - \text{Admin and Indirect Costs} = \text{Total Available Allocation}$$

Step 2

$$\text{Total Available Allocation} \div \text{Total Enrollment (LEA + NPS)} = \text{Per Pupil Allocation}$$

Step 3

$$\text{NPS Enrollment} \times \text{Per Pupil Allocation} = \text{Proportional Share}$$



Federal Transferability (1)

- To ensure timely and meaningful consultation, the LEA shall consult with appropriate private school officials during the design and development of the LEA's programs.
- The LEA will notify the transfer of funds within the CARS.
- The LEA may transfer all or a portion of funds.



Federal Transferability (2)

- Regardless of the LEA federally transferring Title IV, Part A funds:
 - Equitable services consultation is required prior to transfer of funds;
 - Equitable services proportional share is determined based on where funds were transferred to; and
 - A needs assessment is required to document the transfer of funds (ESSA Section 4106[d]).



Uses of Title IV Funds

- Well-Rounded Education (ESSA Section 4107)
 - **At least 20 percent** of total LEA allocation
- Safe and Healthy Students (ESSA Section 4108)
 - **At least 20 percent** of total LEA allocation
- Effective Use of Technology (ESSA Section 4109)
 - **A portion of funds up to 15 percent** of technology infrastructure

*** The spending requirements for Title IV, Part A applies to the total LEA allocation and not the non-profit private school proportional share.**



Title IV, Part A Frequently Asked Questions



Frequently Asked Questions (1)

1. How do we know which private schools need to be consulted for the purposes of T4A?

- LEA attendance boundary area maps (LEA level)
- CDE California School Directory
- CDE Private School Affidavit Data
- County Office of Education (local)



Frequently Asked Questions (2)

2. What if an LEA reaches out to the private schools within the attendance boundary area and receive no response(s) back?

- It is important to document that there has been no response/participation for the purposes of Title IV, Part A FPM reviews.
- Keep detailed records of attempts to contact the eligible non-profit private schools; email threads and read receipts (email); certified mail tracking (physical mail); logs of attempts to contact (by phone), etc.



Frequently Asked Questions (3)

- 3. Can an LEA allocate the private school equitable services proportional share straight to the private schools for use?**
- No. Title IV, Part A funds used to provide equitable services, materials, equipment, and property purchased with those funds, shall be administered and maintained by the local educational agency (LEA) in accordance with ESSA Section 8501[d][1].



Frequently Asked Questions (4)

4. If a private school did not spend the equitable services proportional share in the year it was allocated, do we calculate double the allocation in the following year?

- No. An LEA may not double the equitable services allocation in the following year if not spent by the private school, however, if a private school's equitable services allocation has been obligated in a prior year and there has been a delay in equipment/materials being received (for whatever reason), this scenario should not affect the equitable services proportional share allocation in the following year.



Frequently Asked Questions (5)

5. Do capital expenditures apply to Equitable Services proportional share funds?

- Yes. The LEA will need prior approval to make a capital expenditure purchase with Title IV, Part A funds of \$5,000 or more, even when related to equitable services proportional share allocations.





Contact Information

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QUESTIONS



Title IV, Part B

**Nita M. Lowey's 21st Century Community Learning Centers
and After School Safety and Enrichment for Teens Programs**

CALIFORNIA DEPARTMENT OF EDUCATION

Tony Thurmond, State Superintendent of Public Instruction



Eligibility

- An “eligible entity” refers to an LEA, community-based organization (CBO), Indian tribe or tribal organization (as defined in *25 United States Code [U.S.C] Section 5130*), another public or private entity, or a consortium of two or more such agencies, organizations, or entities (*20 U.S.C. Section 7171[b][3]*).
- Examples of entities eligible to apply for 21st Century funds include:
 - Private schools, provided that they serve public school students.

Note: Enrollment for private schools will be verified by using the Private School Directory. Please visit the CDE’s Private School Data web page located at: <https://www.cde.ca.gov/ds/si/ps/index.asp>.



Consultation with Private Schools (1)

- Any applicant that is awarded a grant must provide equitable After School Program services to private school students whose school is in the public school attendance area.
- To the extent consistent with the number of eligible students an LEA must have timely and meaningful consultation with appropriate private school officials on how to provide equitable and effective programs for those students and their teachers or other educational personnel that address their needs under the program. (20 U.S.C. Section 7881[c][1]).



Consultation with Private Schools (2)

- To identify the private schools located in the attendance area, please visit the CDE California School Directory web page located at:
<https://www.cde.ca.gov/re/sd/index.asp>.
- Applicants must retain documentation of the private school consultation certification form for audit and state monitoring purposes. Please see additional information and guidance regarding private school consultation requirements on the CDE Guidance Document web page located a:
<https://www.cde.ca.gov/sp/sw/t1/privateschoolsvs.asp>.



Private School Consultation Certification form

IX. Application Checklist

Required ASSIST Form Submissions: Applicants that do not have an existing logon to access and apply through ASSIST may request a hard copy application up until the day prior to the application due date. Please contact the request for application (RFA) helpdesk for further information and instructions (see Contact Information, page ii, in this RFA). Applicants with ASSIST logons must complete the application using ASSIST.

- Private School Consultation Certification (refer to Section V. Application and Program Requirements, J. Consultation with Private Schools Section, in this RFA; no Co-Applicant signatures required).



Contact

All RFA questions and correspondence should be submitted by email through the 21st CCLC RFA Helpdesk at:
21stCCLCandASSETsRFA@cde.ca.gov.

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Equitable Services Resources

- ❑ **CDE's Equitable Services Ombudsman web page:**
<https://www.cde.ca.gov/sp/sw/t1/ombudsmaneqservices.asp>
- ❑ **CDE's Title I Services for Students in Private Schools web page:**
<https://www.cde.ca.gov/sp/sw/t1/privateschoolsvs.asp>
- ❑ **CDE's Title II, Part A, Equitable Services web page:**
<https://www.cde.ca.gov/pd/ti/tiiaprivateschools.asp>
- ❑ **CDE's Title III EL Student Program Private Schools web page:**
<https://www.cde.ca.gov/sp/el/t3/elprivateschools.asp>
- ❑ **CDE's Title III Immigrant Student Private Schools web page:**
<https://www.cde.ca.gov/sp/el/t3/immprivschool.asp>
- ❑ **CDE's Title IV, Part A: SSAE - Specialized Programs web page:**
<https://www.cde.ca.gov/sp/st/>



A word cloud of thanksgiving words in various languages, centered around the English phrase "thank you". The words are arranged in a roughly circular shape, with "thank you" being the largest and most prominent. Other large words include "danke", "gracias", "merci", "dziękuję", "obrigado", "sukriya", "arigatō", "terima kasih", "mochchakkeram", "go raibh maith agat", "dank je", "teşekkür ederim", "ngiyabonga", "tapadh leat", "bedankt", "sagolun", "inngin", "sokorakaloutioun", "kop khun krap", "taiku", "grazie", "arigatō", "tak", "dakujem", "trugarez", "merci", "sukriya", "kop khun krap", "taiku", "grazie", "arigatō", "tak", "dakujem", "trugarez", "merci", "sukriya", "kop khun krap", "taiku", "grazie", "arigatō", "tak", "dakujem", "trugarez", "merci".

Words included in the word cloud:

- danke
- thank you
- gracias
- merci
- dziękuję
- obrigado
- sukriya
- arigatō
- terima kasih
- mochchakkeram
- go raibh maith agat
- dank je
- teşekkür ederim
- ngiyabonga
- tapadh leat
- bedankt
- sagolun
- inngin
- sokorakaloutioun
- kop khun krap
- taiku
- grazie
- arigatō
- tak
- dakujem
- trugarez
- merci
- sukriya
- kop khun krap
- taiku
- grazie
- arigatō
- tak
- dakujem
- trugarez
- merci
- danke
- ngiyabonga
- teşekkür ederim
- tapadh leat
- bedankt
- sagolun
- inngin
- sokorakaloutioun
- kop khun krap
- taiku
- grazie
- arigatō
- tak
- dakujem
- trugarez
- merci
- sukriya
- kop khun krap
- taiku
- grazie
- arigatō
- tak
- dakujem
- trugarez
- merci