

***FASFEPA FALL FORUM  
ORLANDO, FL  
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***PRIVATE SCHOOLS: TIMELINESS OF  
SERVICES, EQUITABLE SHARES, AND  
ROLL FORWARD FUNDS***

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TITLE I, PART A



# Brain – Bender Questions ???



# WHAT IS CONSIDERED TIMELY?

- Consultation
- Sending out Notices to Schools
- Receiving Documents from Schools
- Service Delivery Plans
- Hiring a Third-Party Contractor
- Starting Services



# TIMELINESS OF SERVICES

LEA Consultation Timelines  
With  
Private School Officials



# CONSULTATION TIMELINES

**In preparation for the next school year:**

- **November/December**
- **December through February**
- **February/March**
- **March/April**
- **April/June**
  
- **August**
- **September**
- **October**



# RECEIVING DOCUMENTS FROM SCHOOLS

- December-February
  - Intent to participate form (further discussion)
  - Obtain from principals (or a central office) poverty data (as appropriate) on private school students
- March-April
  - Lists of names, addresses, and grades of private school students who meet the criteria
- April-June
  - Written affirmation that timely and meaningful consultation has occurred



# PLANS AND CONTRACTS

- **Service Delivery Plans - *March/April***

Discuss with private school officials the needs of selected students, appropriate Title I services to serve those needs, and location of services.

- **Hiring a Third-Party Contractor - *April/June***

Complete all necessary reports, contract negotiations, ordering of materials, hiring of teachers, etc.

Consultation should be completed for the next school year prior to LEA submitting its Title I application to the SEA.



# STARTING SERVICES

Under the equitable services provision of the Title I statute, the Title I program for private school participants ***must begin at the same time as the Title I program for public school participants.*** Therefore, the required consultation should begin early enough so that Title I teachers can be hired and materials ordered in order for the Title I program to start at the beginning of each school year.



# STARTING SERVICES

- **B-40. What are the obligations of an LEA that does not start the Title I program for private school participants at the same time it starts the Title I program for public school students?**
- An LEA is obligated to provide Title I services on an equitable basis, and the expectation is that Title I services start at the beginning of each school year. If the LEA begins the Title I program late in the school year, in order to comply with applicable requirements, the LEA should provide additional services during the remainder of the year and carry over any unspent funds that should have been used to provide equitable services for private school students and add them to the instructional funds for the private school participants for the next school year.



# TIMELY SERVICES

## (USED GUIDANCE)

- Services start when mutually agreed upon by the LEA and private school.
- LEA must demonstrate that services began as soon as possible and that the start date was agreed upon during consultation. **DOCUMENT!**
- It is strongly recommended that the LEA send a letter indicating a certain date for an agreement of services of services to start. LEA should send it certified mail receipt.
- If there is a pattern of not starting services on time and non-cooperation, the FDOE may get involved.



# TIMELY SERVICES (USED GUIDANCE)

Q. What can the LEA do if the private schools do not return needed documentation?

A. At least three to four different good faith efforts should be documented. Those efforts should be at separate times (not all on the same day) and through separate methods. For instance: an email, telephone call, mailed letter, certified letter, planned conference, or a site visit.

ED monitors timeliness of services to ensure that private schools are given every opportunity to participate in Title I services.

LEAs need to have detailed documentation as to why services aren't provided to such private schools.



# EQUITABLE SHARES

**In order to meet Equitable Services requirements an LEA *must*–**

- Provide eligible private school children with an opportunity to participate.
- Meet the equal expenditure requirements for instruction, professional development, and parental involvement.
- Assess student needs and the effectiveness of the Title I program.
- Begin Title I programs at the same time as the Title I programs for public school children.



# EQUITABLE SHARES

- An LEA must calculate equitable services based on Title I funds.
- Equitable services must be calculated based on the following Title I reservations:
  - Highly Qualified Teachers and Paraprofessionals
  - Parental Involvement
  - LEA-wide activities: Professional Development and Instructional Services
    - LEA-wide activities benefit all Title I schools and are not based on schools' performance status.
- Equitable services must be clearly identified in the LEA's budget. (Title I application)



# EQUITABLE SHARES - EXAMPLE

- Number of FRPL students attending public schools = 10,000
- Number of FRPL students attending private schools = 50
- $10,000 + 50 = 10,050$
- Proportionate rate:  $50/10,050 = .005$  or .5%



# EQUITABLE SHARES -EXAMPLE

## ○ HQT:

LEA Reservation= \$4000.00

Private School Share= \$20.00

Total Set Asides:

\$20.00

## ○ PI:

LEA Reservation= \$46,000.00

Private School Share= \$230.00

\$230.00

\$300.00

\$175.00

## ○ LEA-Wide:

### • Professional Development:

LEA Reservation= \$60,000.00

Private School Share= \$300.00

\$725.00 Total

### • Instructional Services:

LEA Reservation= \$35,000.00

Private School Share= \$175.00

Allocation from Tiering Chart:

\$38,000.00

**TOTAL:** \$38,000.00 + \$725.00 = **\$38,725.00**



# EQUITABLE SERVICES GENERATED BY SES

- SES is an LEA-wide activity
  - All Title I schools benefit; therefore, all Title I students attending private schools should benefit from the equitable share generated by proportionate rate.
- The equitable share for the private school may be used for instructional purposes only.
- In addition, if an LEA uses Title I funds for SES software programs, onsite support facilitators, or other supporting activities, these activities would also be subject to equitable services. Such activities should be included in the LEA's "LEA-WIDE INSTRUCTIONAL" set-aside and coded as "E" in the budget.



# ROLL FORWARD FUNDS

What happens if an LEA does not spend all of the designated private school funds for a school year?



# ROLL FORWARD FUNDS

**Q. How does the carryover provision apply to equitable services for private school children?**

A. In general, if an LEA provided equitable services for private school students in the first year, any carryover funds would be considered additional funds for the entire Title I program in the subsequent year, and would be part of the LEA's Title I resource base in the next year. Those funds would be used, along with any other carryover funds, for serving both public and private school students on an equitable basis. This situation might occur, for example, if private school students did not fully participate in the federal program in the first year, even though an equitable program was planned and offered for those students.



# ROLL FORWARD FUNDS

- However, there may be a circumstance in which equitable services were not provided, for example, because of a delay by an LEA in implementing an equitable program for private school children. As a result, the LEA could not spend all the funds it had available for providing equitable services to private school children and needed to carry over those funds and use them to provide services to private school children in the following year. These carryover funds would be in addition to funds that the LEA would otherwise be required to use to provide equitable services for private school students out of the LEA's current-year allocation.
- Under either situation, the LEA retains control of the federal funds **(DOE TAP 4/27/2012) DPS: 2012-26**



# ROLL FORWARD FUNDS

**Q.** The Snowden School District designed an equitable services program through the consultation process with officials from four private schools with Title I eligible children residing in the LEA. At the end of the school year, \$10,000 remained from the funds available to serve private school children and \$45,000 remained from the funds available to serve public school children. What happens to the \$55,000 of Title I funds not expended?



# ROLL FORWARD FUNDS

**A.** If the private school officials concurred that their eligible private school children received equitable services, the \$55,000 remaining from both Title I programs at the end of the school year is carried over into the next school year's budget. In the next school year, the LEA reserves funds from the current year funds (for variables such as administrative costs, professional development, parent involvement, choice-related transportation and supplemental services, homeless children, etc.) in accordance with Sec. 200.77 of the regulations.



# ROLL FORWARD FUNDS

The LEA does NOT include carryover funds when determining current year reservations. After the reservation determinations, the LEA has several options for allocating the \$55,000 carryover funds, including adding it to any of the Sec. 200.77 reservations or adding it to the funds for school attendance areas, or both.



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