



# Equitable Services

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# Equitable Services Overview

- Consultation
- Allocations
- Monitoring
- Administrative Costs

# Equitable Services Requirements Under the Every Student Succeeds Act (ESSA)

## Section 1117:

- Title I, Part A - Academic Achievement of At-Risk Students

## Section 8501:

- Title I, Part C - Education of Migratory Children
- Title II, Part A - Supporting Effective Instruction
- Title III, Part A - Language Instruction for Limited English Proficient and Immigrant Students
- Title IV, Part A - Student Support and Academic Enrichment
- Title IV, Part B - 21<sup>st</sup> Century Community Learning Centers (CCLC)
- Project SERV - School Emergency Response to Violence



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# Consultation

## Consultation should include...

- Proportion of funds allocated for services and methodology used to identify this;
- Identification of target population and their need, as applicable;
- Services that will be offered;
- How, where, when, and by whom services will be provided;
- Applicable assessments and monitoring of services; and
- Size and scope of services.

## Goal of Reaching Agreement

- Good faith efforts of all parties to reach agreement.
- Consult before decisions are made and services are implemented.
- Provides a genuine opportunity for all parties to express their views and have their views given serious due consideration.
- Discuss viable options for ensuring equitable participation.

## Disagreements

- If the local educational agency (LEA) disagrees with the views of the private school officials with respect to an issue discussed during consultation, the LEA must provide in writing to such private school officials the reasons why the LEA disagrees.
- Contact the ombudsman to help facilitate reaching an agreement.

## Results of Agreements

LEAs and private school officials shall both have the goal of reaching an agreement on how to provide equitable and effective programs for eligible private school children, the results of which agreement shall be transmitted to the ombudsman.

*This is only applicable to Title I, Part A*





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# Allocations

## Determining Proportional Share: Title I, Part A

- Expenditures for equitable services are to be equal to the proportion of Title I funds based on the number of children from low-income families who reside in a participating Title I public school attendance area and attend a private school.
- LEAs must consult with the appropriate private school officials regarding the method or sources of data that are used to determine the number of children from low-income families who reside in a participating Title I public school attendance area and attend a private school.

## Methods to Collect Poverty Data

- Same measure of poverty used to count public school children
- Comparable poverty data from a different source
- Poverty data from a parent survey
- Proportionality
- An equated measure correlated with the measure used for public school students

## Poverty Data from a Survey

- To the extent possible, the survey must protect the identity of families of private school students.
- Survey should include:
  - Students' address to verify whether they reside in a participating Title I public school attendance zone;
  - Grade level and age of each child; and
  - Income level of parents.
- If complete actual data from a survey are unavailable, an LEA must extrapolate from a representative sample.

## Determining Proportional Share: Title I, Part A

<b>Title I, Part A Equitable Services Example</b>			
<b>LEA's Overall Title I Allocation</b>		\$100,000	
<b>Served Public School Attendance Area</b>	<b>Number of Public School Low-Income Children</b>	<b>Number of Private School Low-Income Children</b>	<b>Total Number of Low-Income Children</b>
<b>A</b>	500	200	700
<b>B</b>	300	75	375
<b>C</b>	100	25	125
<b>Total</b>	900	300	1,200
<b>Proportion</b>	75%	25%	
<b>Equitable Services Allocation</b>		25% of \$100,000 = \$25,000	

## **Determining Proportional Share: Section 8501 Programs**

- Expenditures for equitable services for programs under Section 8501, ESSA, are equal on a per-pupil basis to the expenditures for participating public school children and educators.
- LEAs should determine the proportional share after consultation with appropriate private school officials based on relative enrollments of public and private school children and may also consider other factors that pertain to educational need.

## Determining Proportional Share: Section 8501 Programs

<b>Title IV, Part A Equitable Services Example</b>	
<b>Number of Students (ages 5-17)</b>	
<b>A1. LEA Total Enrollment</b>	900
<b>A2. Participating Private Schools Total Enrollment</b>	100
<b>A3. Total Enrollment = A1 + A2</b>	1,000
<b>Title VI, Part A Base Preliminary Allocation</b>	
<b>B1. Total LEA Base Preliminary Allocation</b>	\$1,000,000
<b>B2. Administrative Costs (for public and private school programs)</b>	\$50,000
<b>B3. LEA Base Preliminary Allocation Minus Admin Costs = B1 – B2</b>	\$950,000
<b>Per Pupil Rate</b>	
<b>C1. B3 divided by A3</b>	\$950
<b>Equitable Services</b>	
<b>Amount LEA must reserve for equitable services for private school teachers and other educational personnel = A2 x C1</b>	\$95,000



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# Monitoring



## LEA Obligations

- Provide services and other benefits to eligible children attending private schools (not-for-profit only), their teachers, and their families;
- Ensure services are equitable to the public schools (not necessarily identical) and designed to meet the needs of private school students;
- Provide services that are secular, neutral, and non-ideological; and
- Maintain control of funds and services.

## Fiscal and Administrative Control

- LEA must maintain control of all materials, equipment, and supplies purchased with these funds and located at the private schools.
- LEA must administer and retain control over funds and services; therefore, it cannot reimburse private schools. An LEA may pay a provider directly or reimburse the individual private school teacher or other staff for professional development that the LEA has pre-approved after timely and meaningful consultation.

## Documentation

- Meeting minutes, notes, presentations, and agendas;
- Email correspondence and phone call log;
- Student and program data, such as, needs assessments and program evaluations;
- Written affirmation of consultation; and
- Financial reports, including information about roll forward.



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# Administrative Costs

# Administrative Costs

## Title I, Part A:

- After an LEA determines the proportional share of funds available for equitable services, the LEA may reserve reasonable and necessary administrative costs prior to determining the amount of services students in each private school receive.

## Section 8501 Programs:

- An LEA may reserve off the top of its allocation under a federal program reasonable and necessary administrative costs, which would include administrative costs necessary to provide equitable services.



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