

SCHOOL DISTRICT OF PHILADELPHIA / INTERMEDIATE UNIT 26

OFFICE OF NON-PUBLIC PROGRAMS



**GUIDE FOR NON-PUBLIC SCHOOL EQUITABLE
SHARE CONSULTATION, FUNDING AND SERVICE
DELIVERY**

November 2017

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Introduction

Federal regulations require that Local Education Agencies (LEAs, in this case the School District of Philadelphia or Intermediate Unit 26) set aside an equitable share of certain federal dollars received as subgrants through the Commonwealth of Pennsylvania to ensure that eligible students, parents and/or staff in non-public schools are able to participate, on an equitable basis, in services and programs funded by those subgrants. The funds in question include Elementary and Secondary Education Act (ESEA) Title I Part A, Title II Part A, Title III and Title IV funds, as amended by the Every Student Succeeds Act (ESSA), as well as Individuals with Disabilities Education Act (IDEA) Part B funds, and other federal funding streams. Federal regulations also stipulate that federal funds cannot pass directly from the LEAs to the non-public schools. The LEA must administer and retain control of these funds, engaging non-public entities in a consultation process to provide services to eligible students, their parents and their instructional staff in the non-public schools. In providing these services, the LEA must follow all federal cost principles and policies and procedures for federal grant management and compliance.

This document is intended to clarify consultation roles, relationships and processes, describe the equitable share methodology by funding source under ESSA, address the implementation of services, and provide a comprehensive timeline for all activities to occur prior to and during the school year.

Consultation

The following discussion is derived from federal guidance¹ regarding the scope and tenor of consultation and the collaborative relationship it is intended to embody.

Roles and Relationships

Federal guidance indicates that:

“Consultation involves discussions between public and private school officials on key issues that affect the ability of eligible private school students to participate equitably in Title I programs.”

Effective Consultation:

- provides genuine opportunities for all parties to express their views and to have those views considered;
- fosters positive and productive working relationships; begins with and is guided by an assessment of the needs of eligible students, parents and educational staff; and
- results in appropriate services that meet the needs of eligible students.

Regulatory requirements of consultation include:

- how the needs of eligible private school children will be identified;
- what services will be offer to eligible private school children and when, including the time of day the services will be provided;

¹ Title I Services to Eligible Private School Children, Non-Regulatory Guidance, October 17, 2003; Title II Improving Teacher Quality State Grants: ESEA Title II, Part A, Non-Regulatory Guidance, October 5, 2006; Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements under the Elementary and Secondary Education Act of 1965, as Amended by Every Student Succeeds Act (ESSA).

- how and when the LEA will make decisions about the delivery of services;
- how, where and by whom the services will be provided to eligible private school children;
- how the services will be academically assessed and how the results will be used to improve services;
- the services the LEA will provide to teachers and families of participating private school children;
- the size and scope of the equitable services the LEA will provide to the eligible private school children and the proportion of funds allocated for such services;
- the method or source of data the LEA will use to determine the number of private school children from low-income families residing in participating public school attendance areas;
- discussion of service delivery mechanisms the LEA will use to provide service and whether the LEA will provide services directly or through a separate government agency, consortium, entity or third-party contractor;
- whether to provide equitable services to eligible students by combining the funds generated into one or more pools of funds based on all the children from low-income families in a participating school attendance area who attend private schools; and
- the LEA must obtain written affirmation from the private school official that consultation has taken place and the affirmation document must provide an opportunity for the private school official to indicate that adequate consultation has not occurred.

For services rendered through third party service provider contracts, a LEA must include for consideration in the procurement process:

- population to be served;
- when supplemental services will be provided;
- duration of supplemental services;
- evaluation defined by LEA;
- alignment with private school curriculum and programs & how the program will support what is already in place in the classroom;
- list of required deliverables;
- how the vendor will coordinate with non-public school staff and with what frequency; and
- for services rendered through third party service provider contracts an LEA must follow procurement processes compliant with federal regulations and cost principles set forth in the federal Uniform Grant Guidance (UGG) as well as the LEA's policies and procedures on grants management and compliance, including competitive procurement processes.

Planning and lead time for procuring goods and services and for approving expenditures are a necessity given the nature of requirements of federal cost principles. All procurements and expenditures must be compliant with the School District of Philadelphia's policies and procedures on federal grant management and compliance, including, but not limited to: travel, meals, competitive procurement and contracting, supplemental pay, and other non-payroll expenditures. All oversight

will be managed by the Office of Non-Public Programs with the support of the SDP's Office of Grant Compliance.

Consultation is an on-going process. It occurs most intensively during the planning period in advance of the start of a new fiscal and school year, and it occurs throughout the year to improve service delivery consistent with the scope of the agreed plan.

Scope of Equitable Share Services by Funding Source

Title I, Part A Services

Title I, as amended by ESSA, provides Federal financial assistance to LEAs to ensure that all children have a fair, equal and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging academic standards. Accordingly, Title I requires each participating LEA to provide Title I services to eligible non-public school students. These services must be equitable to those provided to public school students in each LEA.

The target population is non-public school children identified as failing or most at risk of failing to meet challenging academic content and student academic achievement standards as adopted by each participating students' non-public school. Funds are allocated to non-public schools for instruction and parental involvement activities.

Title II, Part A Services

Title II, Part A funds are for non-public school teachers, principals, and other eligible, educational personnel to participate in professional development activities that will improve teacher and principal quality and thereby increase student achievement.

Professional development activities can include:

- Improving the knowledge of teachers, principals, and other educational personnel in one or more of the core academic subjects and in effective instructional 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 in improving student behavior, identifying early and appropriate interventions, and involving parents more effectively in their children's educations;
- Leadership development and management training to improve the quality of principals and superintendents; and
- Training in the use of data and assessments to improve instruction and student outcomes.

Points of Clarification:

- Title II, Part A funds may be used to pay for a non-public teacher's attendance at a professional conference to the extent that the conference is part of a sustained and comprehensive secular professional development plan for the teacher.
- Title II, Part A funds may *not* be used to pay for a substitute teacher who replaces a non-public school teacher who is attending a professional development activity.
- If a non-public school requires professional development for its teachers (say, four days a year), Title II, Part A funds must provide professional development activities over and above this requirement.

Title III Services

Title III funds provide supplemental services to ensure that Limited English Proficient (LEP) students, including immigrant children, develop English proficiency and meet the same academic content and academic achievement standards that other children are expected to meet. Title III funds may also be used to provide staff with professional development in educational strategies to best meet the academic and language needs of English Learners and for activities that promote parent, family and community engagement.

There are two different Title III allocations, an LEP allocation that is subject to Equitable Share and an Immigrant allocation that is not subject to Equitable Share. The SDP always receives a Title III LEP allocation. However, the Title III Immigrant allocation is not always available. In the non-public school setting, there is no requirement of programs for LEP students. Therefore, there is no supplement not supplant provision for the use of Title III funds. Since the equitable share allocation for Title III LEP is small, the SDP does not conduct a needs assessment specific to Title III. Rather, the needs assessment for federal programs includes assessing the needs of LEP students in non-public schools and then meets those needs using both Title I and Title III funds.

Title IV Services

Title IV funding consolidates various existing federal grants into a single award to the LEA. Title IV funds are used for three primary purposes: 1) to provide students with a well-rounded education; 2) to support safe and healthy students; and 3) to support the effective use of technology. Title IV is subject to Equitable Share to non-public schools.

IDEA, Part B Services

IDEA Part B funds provide supplemental special educational services for students with disabilities. IDEA is a comprehensive piece of legislation that identifies the criteria under which students might become eligible for services and spells out the types of services they might be eligible to receive. Generally, the services are designed to remove barriers commonly faced by individuals with disabilities in accessing full participation in educational programs. The law stipulates that students with disabilities should be evaluated by experts in education and disability and that the students, along with their parents/guardians, should be participants in devising their own educational goals and plans. The supplemental services provided should be aligned to those jointly developed plans and designed to help students achieve their educational goals.

Provisions within IDEA pertaining to the equitable participation of students enrolled (by their parents) in non-public schools require LEAs to:

- Reach out to non-public schools to solicit input in the process of identifying students with disabilities (“Child Find”);
- Provide individual assessments of identified students with disabilities enrolled in non-public schools; and
- Consult with non-public school representatives and parents of non-public school students with disabilities in planning and providing available appropriate services.

IDEA Part B equitable share funds may be used to provide supplemental special educational services such as Braille translation of instructional materials, certain types of assistive technology for learning, etc. IDEA Part B equitable funds may not be used for non-public school tuition or uniforms.

Discretionary/Competitive Federal Grant Programs with Equitable Participation

From time to time, other federal grants with provisions for equitable participation are awarded to the SDP or IU 26, often on a discretionary or competitive basis. In such programs, the application process itself requires consultation between the applicant LEA and representatives of non-public schools eligible for equitable participation. The timelines and processes for these applications, including consultation with non-public schools, vary from program to program. In the current year 2017-18 school year, the only such award in the SDP is a Title II, Part B (“Math and Science Partnership”) grant – a professional development initiative providing university-level coursework for teachers in math and science content areas, which has included outreach to teachers in non-public schools. The SDP will ensure that appropriate consultation occurs in a timely fashion as opportunities to pursue such grants arise.

Equitable Share Funding and Calculation Methodology

Calculating Equitable Share of Title I Funding

The primary purpose of Title I funds is for the SDP:

- to close the achievement gap, particularly for academically disadvantaged children; and
- to ensure that children have a fair, equal and significant opportunity to obtain a high quality education and reach the State’s academic standards.

Under ESSA, the calculation for Equitable Services to Non Public Schools has been greatly simplified. Once the SDP receives its Title I allocation from the Pennsylvania Department of Education (PDE), the percentage of identified poverty students that attend non-public schools is used to calculate the amount of Title I dollars that will be given as Equitable Share.

From the Non-Public Equitable Share allocation, at least 1% must be used for Parental Involvement and Family Engagement activities and funds needed to administer the Non–Public programs must be deducted before calculating how much of the Equitable Share is available to provide services to the non-public schools with eligible students.

For FY2017-18, the biggest challenge is to identify the non-public poverty eligible children. There are several sources that can be used separately or in combination. Those methods include paper surveys to identify poverty eligible students in each school, participation in the National School Lunch Program (NSLP), and then the application of the Community Eligibility Program (CEP) multiplier (created by the United States Department of Agriculture) for students in eligible NSLP schools. The CEP multiplier is also used by SDP for public schools where applicable.

The total non-public equitable share for Title I is calculated using the following formula:

Number of poverty students in non-public schools	÷	Total number of poverty students in SDP (public and all non-public)	=	Percentage of NP to total
Percentage of NP to total	x	SDP Title I Award	=	\$ Equitable amount for NP services
Equitable amount for NP Services	x	1% for Parental Involvement	=	\$ Amount available for PI
Equitable amount for NP Services	-	\$ Amount available for PI - SDP Administrative Costs	=	\$ Amount available for Instruction

The individual school portion of the Title I equitable share is calculated as follows:

Instruction

$$\frac{\text{Amount Available for Instruction}}{\text{Total number of non-public poverty students}} = \text{Per Pupil Amount for Instruction}$$

Parental Involvement

$$\frac{\text{Amount Available for PI}}{\text{Total number of non-public poverty students}} = \text{Per Pupil Amount for PI}$$

After deriving the total amount of Equitable Share available and the Per Pupil amount, the non-public share of Title I funds are then distributed equitably to the non-public schools based on each non-public school count of identified poor multiplied by the Instructional Per Pupil Amount and the Parental Involvement Per Pupil Amount. These funds can be pooled among schools via the consultation process.

Calculating Equitable Share of Title II Part A Funding

The SDP receives Title II funds for eligible programming in public schools for preparing, training and recruiting highly qualified teachers and principals. The Equitable Share of Title IIA funds are allocated proportionally based on total enrollment of the SDP and the total enrollment of all non-public schools located within the City of Philadelphia that indicated in PDE’s Private and Nonpublic Schools-Enrollment (PNPE) system to participate in the Title IIA program. Schools record their enrollment in the PNPE system. If a non-public school chooses to participate in the Title IIA program, the entire enrollment of that school is included in the non-public count.

The Title IIA Equitable Share is calculated using the following formula:

$$\frac{\text{Number of students in non-public schools located in Philadelphia that request Title IIA Funding}}{\text{Total number of students in Philadelphia for Title IIA (public and non-public)}} = \text{Percentage of Title IIA non-public to total non-public / public}$$

$$\frac{\text{Percentage of Title IIA non-public}}{\text{Title IIA SDP Award}} \times = \$ \text{Equitable amount for Non-public services}$$

The resulting Equitable Share amount is allocated to each school based on that school’s proportion of students. These funds can be pooled among schools via the consultation process.

Calculating Equitable Share of Title III Funding

The allocation of Title III funds used to serve eligible non-public students is calculated via an equitable share of the SDP’s Title III Award. A per pupil Title III allocation is multiplied by the number of non-public students who the non-public schools identify as Limited English Proficient (LEP); this identification occurs during the fall in response to a survey sent to non-public schools by the Office of Non-Public Programs (ONPP).

The non-public school share for Title III is calculated using the following formula:

$$\frac{\text{Number of LEP students in non-public schools}}{\text{Total number of LEP students in SDP (public and all non-public)}} = \text{Percentage of non-public to total}$$

$$\frac{\text{Percentage of non-public to total}}{\text{Title III LEP Award}} = \$ \text{Equitable amount for non-public services}$$

Individual school allocations are made based on that school’s proportion of LEP students. These funds can be pooled among schools via the consultation process. Rather than conducting a separate Title III consultation process, the ONPP uses the Title III funds to meet the needs of LEP students as identified in the non-public schools’ needs assessments, extending the Title I services utilized for this purpose.

Calculating Equitable Share of Title IV Funding

Authorized under ESSA, the Student Support and Academic Enrichment (Title IV) program is intended to help meet the goals of providing all students with access to a well-rounded education, improving school conditions for student learning and improving the use of technology in order to improve the academic achievement and digital literacy of all students. An Equitable Share of Title IV is available to eligible non-public schools.

LEAs that receives at least \$30,000 in program funds must conduct a needs assessment that, at a minimum, focuses on the three content areas. Based on the results of the assessment, the LEA must use:

- at least 20 percent of funds for activities to support well-rounded educational opportunities;
- at least 20 percent of funds for activities to support safe and healthy students; and
- a portion of funds, but not more than 15 percent, for activities to support effective use of technology.

The Title IV Equitable Share is calculated using the following formula:

$$\frac{\text{Number of students in non-public schools located in Philadelphia that request Title IV Funding}}{\text{Total number of students in Philadelphia for Title IV (public and non-public)}} = \text{Percentage of Title IV non-public to total non-public / public}$$

$$\frac{\text{Percentage of Title IV non-public}}{\text{Title IV SDP Award}} = \$ \text{Equitable amount for Non-public services}$$

Individual school allocations are made based on that school’s proportion of students. These funds can be pooled among schools via the consultation process.

Calculating Equitable Share of IDEA Funding

An Equitable Share of IDEA funding is available to provide services to Philadelphia Non-Public schools with eligible students (“parentally placed”). Amounts to be expended for special education and related services (including direct services to parentally placed private school children) by the LEA/IU should be equal to a proportionate amount of federal funds made available under IDEA-B.

The IU uses Child Find to determine the number of parentally placed children with disabilities attending private schools located in Philadelphia. Using the student count from Child Fund, the IU calculates a proportionate share of IDEA funds.

The IDEA Equitable Share is calculated using the following formula:

$$\frac{\text{Number of IDEA-eligible students in non-public schools}}{\text{Total number of IDEA-eligible students in Philadelphia (public and all nonpublic)}} = \frac{\text{Percentage of NP to total}}{\text{Total IDEA funding for IU 26}} = \$ \text{Equitable amount for NP services}$$

Service Delivery / Monitoring / Continued Consultation

The Office of Non-Public Programs (ONPP) is responsible for retaining control of and administering those federal programs, as set forth in this document, in non-public schools. This requires the ONPP monitoring all aspects of the federal program as delivered via SDP employees and contracted third party service providers.

Beginning with the 2015-16 school year, the SDP implemented a choice model for providing Title I, Title II and Act 89 services in the non-public schools. The Archdiocese of Philadelphia, Independence Mission Schools and each independent, private school that receives Title I, Title II and or Act 89 now has the opportunity to select their service providers each year. Individual schools, or school associations acting on behalf of multiple schools, may choose one contractor from the multiple contractors available including the School District of Philadelphia to provide Title I and Title II services, and they may select the same contractor or different contractor to provide Act 89 services.

As such, the ONPP is responsible for oversight of its employees delivering services in the non-public schools. Oversight of full-time employees occurs via the monitoring of lesson plans, conference forms and informal and formal observations. In addition, the ONPP is responsible for the oversight of any Extended Day and Summer Programs in the non-public schools. If non-public school teachers are working in a federally funded Extended Day and/or Summer Program, they are doing so as a part-time employee of the SDP. The ONPP staff monitor the implementation of Extended Day and Summer Programs, ensuring that teachers are delivering the instruction as agreed to in the Program Information Forms.

The ONPP oversight of contracted service providers will vary depending on the nature of the service. If the contracted service is a professional development or parental involvement activity, the ONPP will periodically ask the principals at non-public schools to verify that services occurred. If the contracted

services are for instructional services, the ONPP will periodically visit classrooms to ensure that instructional services are aligned to the contract.

Throughout the course of the year, the ONPP will engage in both informal and formal consultation with the administrators of non-public schools. Informal consultation occurs during school visits, emails and phone calls, any time information is shared about the non-public programs by either the non-public school administrators or the ONPP.

Timeline of Activities and Benchmarks

The following table depicts the significant tasks related to non-public school program consultation, funding allocations, and implementation for the 2017-18 school year. The dates are approximate and the student identification methodology may change. However, the SDP intends to work collaboratively with its non-public school partners to ensure that these timelines are implemented to ensure service delivery as agreed and will occur as designed.

1. Enrollment and Eligible Student Identification- All enrolled non-public students to be identified.

#	ACTIVITY	TIMELINE	RESPONSIBLE PARTY
1A	<ul style="list-style-type: none"> Notify the SDP of newly opened private schools 	Ongoing	PDE
1B	<ul style="list-style-type: none"> Contact newly identified non-public schools, per correspondence received from PDE. Depending on notification, participation in programs may not occur until the following fiscal year. 	Ongoing as notifications received	SDP ONPP
1C	<ul style="list-style-type: none"> Assign Universal Location Code System (ULCS) codes to newly participating non-public schools and assign logins and passwords to the Title I Portal 	Ongoing	SDP ONPP and SDP Information Systems
1D	<ul style="list-style-type: none"> Send Limited English proficiency and immigrant students surveys to all non-public schools 	September	SDP ONPP
1E	<ul style="list-style-type: none"> Send counts of Limited English proficiency and immigrant students to the SDP ONPP 	September - October	Individual Non-public School Administrators
1F	<ul style="list-style-type: none"> Implement “Child Find” process to identify IDEA eligible students 	Ongoing, especially September – December	IU 26 (Office of Specialized Services), with input from Non-public school administrators
1G	<ul style="list-style-type: none"> If Title I Parent Surveys are needed, distribute to all non-public schools that do not participate in NSLP or CEP 	November	SDP ONPP
1H	<ul style="list-style-type: none"> Completed Title I Parent Surveys are returned to SDP ONPP 	Early January	Individual Non-Public School Administrators
1I	<ul style="list-style-type: none"> Review Title I Parent Surveys by school to determine eligibility and student poverty count by school. 	January - February	SDP ONPP
1J	<ul style="list-style-type: none"> Automatically “roll over” transportation enrollment data from the beginning of the school year for non-public schools (Archdiocesan elementary schools, all Independence Mission Schools, and all independent, private non-public schools) into the Compass/XSIS system 	November	SDP Information Systems

#	ACTIVITY	TIMELINE	RESPONSIBLE PARTY
1K	<ul style="list-style-type: none"> Review and update Compass/XSIS system data for each school and add data to the system to reflect total enrollment (non-public schools new to the process enter their full census data in the system.) 	December – to mid-January	Individual Non-public School Administrators with support from SDP ONPP
1L	<ul style="list-style-type: none"> Review all data entered in Compass/XSIS system by non-public schools for duplicate entries and ensure all schools’ data is entered 	January	SDP Information Systems SDP ONPP
1M	<ul style="list-style-type: none"> Determine student poverty count for each non-public school and the total student poverty count for all non-public schools. 	March	SDP Grant Fiscal Services

2. Calculation and Dissemination of Non-Public Equitable Share Funding

#	ACTIVITY	TIMELINE	RESPONSIBLE PARTY
2A	<ul style="list-style-type: none"> Notify SDP of official, preliminary Title I, Title II, Title III, and Title IV allocations 	May - June	PDE at Annual Pennsylvania Association of Federal Program Coordinators (PAFPC) Conference
2B	<ul style="list-style-type: none"> Apply appropriate formulas to determine each non-public school’s equitable share of various funds 	May - June	SDP Grants Fiscal Services / ONPP
2C	<ul style="list-style-type: none"> Notify non-public schools of funding availability as part of consultation process 	June	SDP ONPP
2D	<ul style="list-style-type: none"> Submit application for IDEA funds (based on preliminary estimate of allocation) 	June 30	IU 26 (Office of Specialized Services)
2E	<ul style="list-style-type: none"> Submit consolidated applications for Title I, Title II, Title III and Title IV 	July	SDP Grant Fiscal Services/ONPP/ Federal Programs

3. Consultation

#	ACTIVITY	TIMELINE	RESPONSIBLE PARTY
3A	<ul style="list-style-type: none"> Send information to non-public schools notifying them that the service provider selection process for the next school year is open. Administrators can discuss service options with contractors. Distribute Service Provider Selection forms to non-public schools 	January - February	SDP ONPP
3B	<ul style="list-style-type: none"> Send completed service provider selection forms to ONPP 	Mid-February	Individual Non-Public School Administrators
3C	<ul style="list-style-type: none"> Complete school-based needs assessments, which identifies areas of strength/weakness based on data, and list in priority order the types of services most needed. 	March – May	Individual Non-Public School Administrators
3D	<ul style="list-style-type: none"> Discussions with non-public school administrators about services. 	May – August	SDP ONPP and 3 rd party service providers, in consultation with school administrators

#	ACTIVITY	TIMELINE	RESPONSIBLE PARTY
3E	<ul style="list-style-type: none"> Make final decisions about services for each school. 	June - August	SDP ONPP and 3rd party service providers, in consultation with school administrators
3F	<ul style="list-style-type: none"> Assign SDP teachers to non-public schools that selected SDP as a service provider and notify administrators and staff of assignments 	July - August	SDP ONPP
3G	<ul style="list-style-type: none"> Notify schools regarding the instructional supports they will have for the school year (IORs, ELLs, Extended Day hours, Summer Program Hours, etc.) 	July – August	SDP ONPP
3H	<ul style="list-style-type: none"> Third party service providers consult with non-public schools about available professional development and parental involvement services. 	June – November	3 rd party service providers, in consultation with school administrators
3I	<ul style="list-style-type: none"> SDP ONPP consults with non-public school administrators about their professional development and parental involvement plans. 	June - November	SDP ONPP and Individual Non-public Schools
3J	<ul style="list-style-type: none"> Identify vendors to provide materials and supplies, professional development, and parental involvement that align to the schools’ needs assessments via competitive processes 	June – November	SDP ONP and 3rd party service providers
3K	<ul style="list-style-type: none"> If necessary, create SRC resolutions for contracts and prepare contracts for vendors to provide professional development and parental involvement activities 	July – February	SDP ONP
3L	<ul style="list-style-type: none"> Training for non-public schools planning an Extended Day program 	September	SDP ONP
3M	<ul style="list-style-type: none"> Conduct information sessions for non-public schools to discuss available IDEA services 	November	IU 26 (Office of Specialized Services)
3N	<ul style="list-style-type: none"> Solicit feedback on services and periodically review plan, make adjustments if necessary/appropriate 	Ongoing	SDP ONP and 3 rd party service providers, in consultation with school administrators