

Non-Public Guidance Appendix

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Title I, A: Non-public Equitable Services

Title I requires that public school corporations provide services that are allowable and comparable to those provided to public school students and teachers participating in the program. These services can be different from those provided to public school participants. The needs of the non-public school students and teachers must be assessed and evaluated. No funds are provided directly to nonpublic schools. For more information about Non-Public Guidance for Title I programs visit the [IDOE's Non-Public Ombudsman](#) web page.

What is Non-public Consultation?

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 a genuine opportunity for all parties to express their views and to have those views considered. Successful consultation establishes positive and productive working relationships that make planning easier and ensure that the Title I services provided meet the needs of eligible students.

Suggested Consultation Timeline



Calculating the Per Pupil Expenditure (PPE)

The PPE for Title I is determined by dividing the Equitable Share by the number of low-income nonpublic school students.

Example: NON-PUBLIC School Equitable Share to be used for Instruction and Professional Development divided by total number of low-income NONPUBLIC school students who live in Title I-served attendance areas ($E \div C$):

$\$ 468,383.56 \div 265 = \$ 1,767.49$ PPE for Instruction and Professional Development

NON-PUBLIC School Equitable Share to be used for Parental Involvement divided by total number of low-income NONPUBLIC school students who live in Title I-served attendance areas ($D \div C$):

$$\text{\$ } 4,731.15 \div 265 = \text{\$ } 17.85 \text{ PPE for Parental Involvement}$$

Non-public Title I Services for Nonpublic Schools Outside of Geographical Boundaries

In the event that a student is attending a non-public school that is outside of his or her public school's geographical boundaries, the Lead LEA may administer services for the student to the nonpublic school. The participating LEA is the school district within whose boundaries the student resides. The equitable share for eligible students is transferred to the Lead LEA. The Lead LEA agrees to implement and oversee Title I services on behalf of all LEAs. Participating LEAs transfer the equitable share to the Lead LEA, if agreement among all parties.

Title I Funding for Non-public Allocation

Under ESSA, a proportion of funds based on total allocation that is equal to the proportion of low income children residing in Title I attendance areas.

How Non-public Equitable Share is Generated for Title I

Funds for Title I services are generated if nonpublic school children are identified for free and reduced lunch or a similar method of socioeconomic status and live within a Title I attendance area. Non-public school students are entitled to Title I services if they live in an eligible school attendance area, and are failing or at risk of failing based on educational need. Students are automatically eligible if they are identified as homeless, migrant, Head Start, or Even Start participants. ESSA requires that the Title I, Part A proportionate share for equitable services be calculated prior to allocating for any expenditures or transfer of funds. This includes any "off the top" funds, such as administrative costs, parent involvement, and district-wide initiatives.

After consultation with private school officials, if the private school opts to receive Title I services, the LEA determines which option it will use to fund the Title I programs for eligible private school children.

Option 1: **School-by-School Basis** - Use funds allocated for eligible private school children to provide Title I services on a school-by-school basis to eligible private school children residing in participating public school attendance areas.

Option 2: **Pooling** - Combine (pool) funds allocated for all eligible private school children to be used to provide Title I services to eligible children who reside in participating public school attendance areas and attend any private school.

Title I funds are always under the direct management of the public school district. Therefore, any instructional staff, materials and supplies, professional development, etc. used in the non-public school must be approved and paid for by the public school district. Private school officials have no authority to obligate Title I funds.

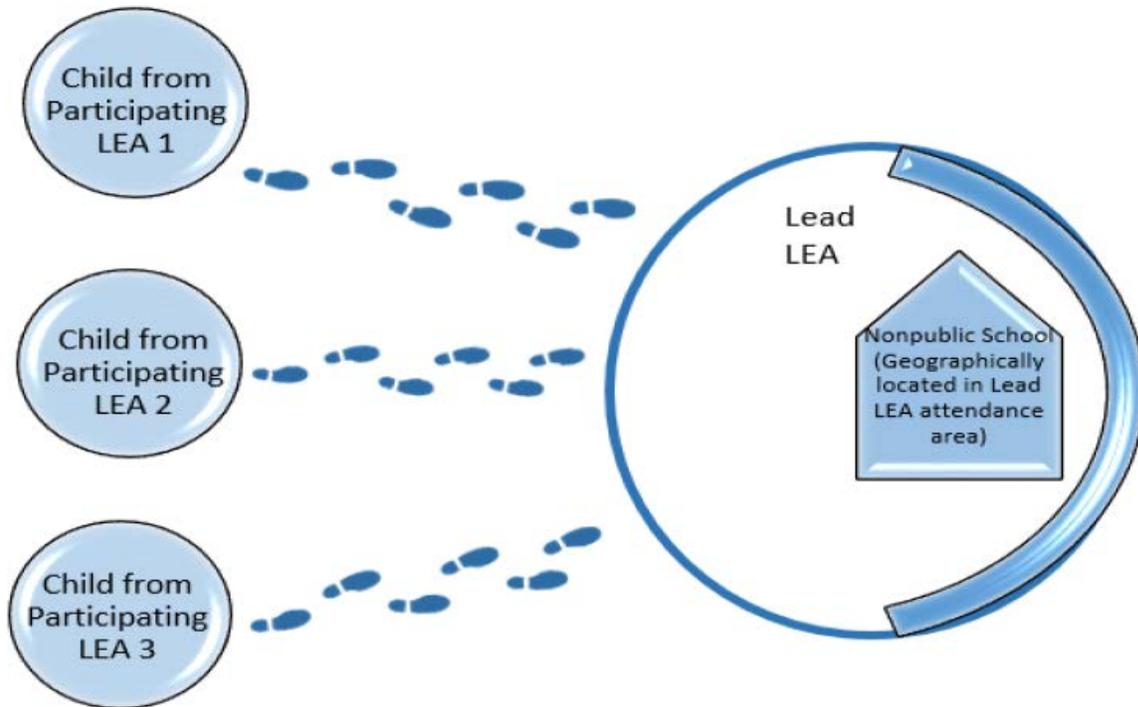
Designing a Program and Determining Equitable Services

The needs of the non-public school students and teachers must be assessed and evaluated. Services must be allowable and comparable to those provided to public school students and teachers participating in the program, but are not required to be the exact same Title I service.

Equitable Share Transfers Process

Thus, the LEA in which the child resides is responsible for providing services to the child, but it may arrange to have services provided by another LEA and reimburse that LEA for costs. The transfer process involves collaboration and agreement between LEAs on the Title I services to be rendered and equitable share to be transferred. As it is not a requirement, an LEA must agree to be the Lead LEA and assume full responsibility of implementing, overseeing, and managing the Title I services and funding on behalf of the other LEA(s). The Participating LEA(s) must agree and transfer the equitable share generated for the eligible non-public school students to the Lead LEA in a timely manner. See the [Work Guide For Managing the Non-public School Equitable Share](#) for more details.

Equitable Share Transfers Process Graphic



Once the NON-PUBLIC School PPE is determined, it must be multiplied by the number of eligible NON-PUBLIC School students attending a NON-PUBLIC school in another LEA's boundary.

Equitable Shares Transfers Chart

Participating LEA	Number of Students Living in Your District's Boundary but Attending a Nonpublic School located in the Lead LEA's Boundary	Parental Involvement PPE	Amount of Parent Involvement Equitable Share to Transfer	Instruction and Professional Development PPE	Amount of Instruction and Professional Development Equitable Share to Transfer	Total Amount of Equitable Share to Transfer
A	14	\$ 17.85	\$ 249.90	\$ 1,767.49	\$ 24,744.86	\$ 24,994.76
B	40	\$ 17.85	\$ 714.00	\$ 1,767.49	\$ 70,699.60	\$ 71,413.60
C	120	\$ 17.85	\$ 2,142.00	\$ 1,767.49	\$212,098.80	\$ 214,240.80

Memorandum of Understanding (Consultation)

LEAs may establish a Memorandum of Understanding with one another in agreement of the duties and responsibilities. The following topics must be discussed between LEAs:

- How and who will identify the needs of eligible private school children.
- What services the LEA will offer to eligible private school children.
- How and when the LEA will make decisions about the delivery of services.
- How, where and by whom the LEA will provide services to eligible private school children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with a third-party provider.
- How the LEA will assess academically and monitor the services to eligible private school children in accordance with §200.10 and how the LEA will use the results of the assessment and monitoring to improve Title I services.
- A timeline for completing the equitable share transfer
- A signed agreement that the Lead LEA will assume full responsibility of consultation and implementation requirements on behalf of the Participating LEA.

Non-public School Distribution Page

Summary of amounts

A. 2017 - 2018 Title I Allocation **\$8,017,955.23**

B. Total number of low-income PUBLIC school students who live in Title I-served attendance areas: **4226**

The total number of low income public school students who live in Title I-served attendance areas.

C. Total number of low-income NONPUBLIC school students who live in Title I-served attendance areas: **265**

The total number of low income non-public school students who live in Title I-served attendance areas (including students attending a non-public school outside of your LEA).

D. NON-PUBLIC School Equitable Share to be used for Parental Involvement: **\$4,731.15**

LEAs receiving at least \$500,000 in Title I funds must apply a proportionate share percentage for services to non-public school students for parent and family engagement activities for the families and parents of eligible non-public school students.

E. NON-PUBLIC School Equitable Share to be used for Instruction and Professional Development: **\$468,383.56**

LEAs must apply a proportionate share percentage for services to non-public school students for other equitable services such as administration, instruction, and professional development for teachers of participating non-public school students.

F. Unexpended equitable share: **\$0.00**

Equitable share funds that were not obligated in the year for which they were appropriated. (Prior year's equitable share carryover)

G. Total Proportionate share to be divided among non-public school students: **\$473,114.71**

Expenditures for equitable services to eligible non-public school children, teachers and other educational personnel, and families must be equal to the proportion of funds allocated to participating public school attendance areas based on the number of children from low-income families who reside in those attendance areas and attend non-public schools.

Non-public Equitable Share Transfers Timeline

To ensure the Lead LEA is provided a full opportunity to implement or adjust the Title I program in a timely and meaningful manner and expend the equitable share accordingly, adjustments to equitable share transfers must be made within 15 business days of receiving a planning Title I allocation, final Title I allocation, or updated Title I

allocation. If for any reason the Participating LEA believes the transfer will not be made within 15 business days, the Title I Program Administrator must contact their assigned Federal Grants Specialist immediately to arrange a conference call with the parties involved. During the conference call, a corrective action plan will be established to ensure the transfer will occur as quickly as possible.

Note: Signed consultation agreements are still required of each non-public school with the Lead LEA. Upon agreement between LEAs, the Lead LEA will assume full responsibility of consultation and implementation requirements on behalf of the Participating LEA.

The Equitable Share Transfers Procedures

The equitable share transfer out is identified as the amount of funds generated for eligible nonpublic school students attending a non-public school in another district's attendance boundary. Once this amount has been calculated, the **Participating LEA** is required to transfer the amount to the **Lead LEA**.

It is the responsibility of the Lead LEA to invoice or bill the Participating LEA for the equitable share amount.

When the amount is determined, the **Participating LEA** must notify their assigned Federal Grants Specialist with the amount of the transfer.

This transfer amount on the Districtwide Administrative Expenses page on the Nonpublic Transfers line. A description box is available to explain the transfer amount. If needed, additional documentation may be attached to the grant application. The **Participating LEA** is expected to transfer the equitable share (pay the invoice) in a timely manner, once received from the **Lead LEA**.

The assigned Federal Grants Specialist will notify the Federal Grants Specialist assigned to the Lead LEA to expect an equitable share transfer in. This may require an amendment to the Title I application. For the **Lead LEA**, the assigned Federal Grants Specialist will add the equitable share transfer amount to the Title I application in the "Other Transfers" box on the Application Summary page. The Lead LEA must budget the additional dollars within the applicable non-public school's budget and expend the dollars for allowable services and expenses for the eligible non-public school students.

Note: The **Participating LEA** must pay the funds out of the current grant year's Title I fund account. The transaction must be charged to the current grant year's Title I fund number. The Business Manager or Treasurer may assist with ensuring this is documented correctly.

The **Lead LEA** must receive the funds into the current grant year's Title I fund account. The transaction must be credited to the current grant year's Title I fund number. The Business Manager or Treasurer may assist with ensuring this is documented correctly.

Equitable Shares Transfers Process and Amendments

The equitable share transfers process may prompt amendments to the Title I application which must be completed and submitted in a timely manner. LEAs will be responsible for adjusting their Title I budgets to account for the transfer in and transfer out in a timely manner.

Equitable Shares and Carryover

In general, to ensure that equitable services are provided in a timely manner, an LEA must obligate the funds allocated for equitable services under all applicable programs in the year for which they are appropriated (ESEA sections 1117(a)(4)(B) and 8501(a)(4)(B).)

The unexpended funds should remain available for the provision of equitable services under the respective program during the subsequent school year. In determining how such carryover funds will be used, the LEA must consult with appropriate non-public school officials. (ESEA sections 1117(b) and 8501(c).) LEAs will be required to carryover those dollars into the next school year and budget them for the participating non-public school. This includes non-public school equitable share amounts received from LEA transfers.

Please note: The unexpended amounts must be within the 15% allowance for carryover dollars. Unexpended nonpublic school equitable share must be reported on the Final Expenditure Report in Part II.

PART II - STATEMENT OF UNEXPENDED BALANCE AT THE END OF THE PROJECT PERIOD	
1a	Total Federal Funds Received: Current Year \$
1b	Plus Monies Transferred into Title I \$ 0.00
1c	Plus Transferred from Prior Year (Unexpended) \$ 0.00
2	Deduct: Fund Disbursements
3	Fund Balance at the End of the Project Period
4	Deduct: Unliquidated Obligations at the End of Project Period
5	Unexpended Balance Available for Transfer to Next Fiscal Year
	Please indicate the mandatory amount set aside in your Title I Application for LEA Improvement
	What portion of Part II, line 5 of this report includes LEA Improvement dollars to carryover to the next fiscal year?
	Please indicate the mandatory amount set aside in your Title I Application for parental involvement
	What portion of Part II, line 5 of this report includes parent involvement dollars to carryover to the next fiscal year?
	Please indicate the mandatory amount set aside in your Title I Application for Non-Public School Equitable Share
	What portion of Part II, line 5 of this report includes Non-Public School Equitable Share dollars to carryover to the next fiscal year?

In cases where an LEA has a substantial amount of equitable share unexpended at the end of the school year, carryover consideration and IDOE Director's Approval may be

granted to limit the equitable share carryover to 15% of the current year's equitable share total. The LEA must provide evidence that a good faith effort was made to consult with the participating non-public school to expend the remaining dollars within the period of availability. Acceptable evidence would include at least one certified letter and mailing receipt, email communications, and meeting minutes.

Non-public Equitable Share for Title II, Part A and Title IV, A

Non-public Equitable Share for Title II, Part A and Title IV, Part A is calculated by taking the total non-public school enrollment (# of students), adding it to the total LEA enrollment (# of students), and dividing it into the total Title II, A allocation minus Administrative Costs or Title IV, A allocation. This gives you a per pupil allocation amount. The Per Pupil Amount is then multiplied by the number of non-public students at each non-public school within the LEA's boundaries. This, in turn, calculates the equitable participation amount for each non-public school participating in the Title II, A or Title IV, A program.

For traditional public school corporations that receive Title II, A and Title IV, A grants, non-public schools that are only within the LEA's geographical boundaries receive the funding. Thus, a non-public student's home address does not affect how the nonpublic school enrollment numbers are calculated.

Non-public Equitable Share for Title III, A

Non-public equitable share for Title III, Part A is calculated by the number of English learners the non-public school submits via the annual DOE-LM (language minority collection). The total state Title III allocation is divided by the total number of identified English learners to generate a per pupil allocation. This per pupil allocation is multiplied by the number of identified English learners per LEA, including the non-public schools within their geographic boundaries. The LEA will notify the non-public schools within their geographic boundaries of the opportunity to participate in Title III, and if applicable, the allocation generated by the English learners within the respective non-public school.