



DEPARTMENT OF EDUCATION

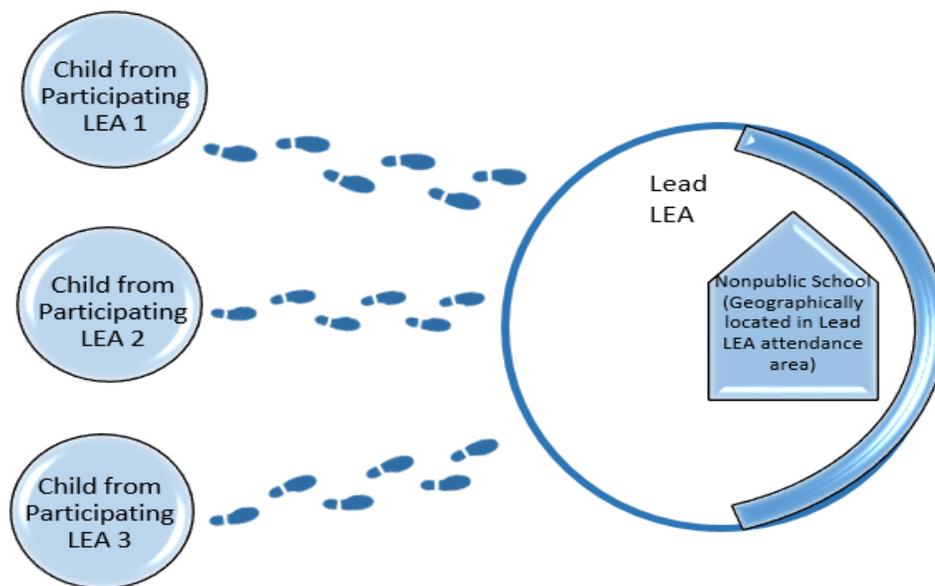
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Working Together for Student Success

A WORK GUIDE FOR MANAGING THE NONPUBLIC SCHOOL EQUITABLE SHARE TRANSFERS PROCESS

What is the equitable share transfers process?

Section 200.62(b)(1)(i) of the Title I regulations defines Title I eligible private school children as those who reside in participating public school attendance areas of the **Local Educational Agency (LEA)**, regardless of whether the private school they attend is located in the LEA. 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 transfers 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 nonpublic school students to the **Lead LEA** in a timely manner.



Designing a Program and Determining the Equitable Share

A **Participating Local Educational Agency (LEA)** is required to provide eligible children attending nonpublic schools, their teachers, and their families with Title I services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families. The same requirements for designing a program must be adhered to by the **Lead LEA** when agreeing to implement, oversee, and manage the Title I services and funding on behalf of the other LEA(s).

LEAs are required to obtain student rosters from the nonpublic school to determine the residential addresses of nonpublic school students in their Title I attendance area(s). Once an agreement has been established between LEAs, the **Participating LEA** is responsible for contacting the **Lead LEA** to determine the following:

- *Address Verification* – Identify students who are living in your district’s attendance boundary but attending a nonpublic school that is geographically located in the **Lead LEA**’s attendance boundary. A list should be provided to the **Lead LEA**. An agreement may be made to allow for the **Lead LEA** to perform the address verification and determine assessment and eligibility on behalf of the **Participating LEA(s)**.
- *Assessment and Eligibility* – From the list, determine the proficiency levels of each nonpublic student and rank nonpublic students in order of academic need. Selection of individuals must be based on multiple educationally related, objective, uniformly applied criteria given to all students (without consideration of income status).
- *Determining the **Per Pupil Expenditure (PPE)*** – The PPE is determined based on the **Participating LEAs** Title I funding and grant application. The Non-Public Schools Distribution page within the Title I application should be used to determine the PPE.

Please note: This means, the nonpublic school students (and associated poverty measure) who live in your attendance boundary but attend a nonpublic in another district’s attendance boundary should be counted on your LEA’s Eligible Schools Summary. This is so that an equitable share is generated for each eligible nonpublic school student.

Calculating the Per Pupil Expenditure (PPE)

The PPE 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 ÷ C):

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

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 ÷ C):

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

$$\text{TOTAL NON-PUBLIC School PPE } \$ 1,767.49 + \$ 17.85 = \$ 1,785.34$$

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: The total number of low income public school students who live in Title I-served attendance areas.	4226
C. Total number of low-income NONPUBLIC school students who live in Title I-served attendance areas: 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).	265
D. NON-PUBLIC School Equitable Share to be used for Parental Involvement: 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.	\$4,731.15
E. NON-PUBLIC School Equitable Share to be used for Instruction and Professional Development: 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.	\$468,383.56
F. Unexpended equitable share: Equitable share funds that were not obligated in the year for which they were appropriated. (Prior year's equitable share carryover)	\$0.00
G. Total Proportionate share to be divided among non-public school students: 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.	\$473,114.71

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.

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**.

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 nonpublic 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 nonpublic 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 out and the name of the **Lead LEA** to whom the transfer is going. The **Participating LEA** must budget 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 nonpublic school’s budget and expend the dollars for allowable services and expenses for the eligible nonpublic 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.



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.



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 nonpublic 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 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 nonpublic 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.