

Private School Participation in Federal Programs

Equitable Services Designed to Meet the
Needs of Private School Students,
Teachers, and Families

Sheila Gerrish and Julie Chace

Federal Programs Equitable Services Co-Ombudsmen
Office of Superintendent of Public Instruction (OSPI)



Agenda

School districts that receive ESEA funds must set aside funds for services to private school teachers and students, authorized by each federal program, in compliance with federal laws and regulations. This presentation provides a broad overview of requirements for providing equitable services to private schools.

- ❖ [Equitable Services Federal Program Requirements– The Basics](#)
- ❖ [OSPI Procedures for Participation in Equitable Services](#)
- ❖ [Consultation Process-Best Practices](#)
- ❖ [Title I Guidance–Out-of-District Procedures/Interlocal Agreements](#)
- ❖ [Private School Annual Approval and Renewal Process–SBE](#)
- ❖ [Federal Program Webpages, Contacts, Additional Resources](#)





Equitable Services Federal Program Requirements The Basics

Equitable Services

The Basics

- The Every Student Succeeds Act (ESSA) continues the requirement of the ESEA Act of 1965 regarding the requirement that a school district that receives Title I funds, must provide equitable services to eligible private school students, their teachers, and their families.
- The most recent [Equitable Services Non-regulatory Guidance](#), specifically, ESEA Section 1117, requires participating school districts, in consultation with appropriate private school officials, to provide eligible children attending private non-profit elementary and secondary 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.

Equitable Services

A Partnership between School Districts and Private Schools

This is a collaborative process based on **shared planning, responsive and accurate data reporting, and respect for timelines** to ensure timely services and supports for eligible students, teachers, other instructional staff, and parents.

School districts, private schools, and OSPI **each have specific responsibilities** to ensure equitable services are provided in a timely and meaningful manner.

Equitable Services

The Basics

❖ **Equitable Services**

Services to private schools should be *equitable to the public school, not identical*. They should be designed to meet the needs of private school students, teachers, and families.

❖ **Equal Expenditures on a Per-Pupil Basis**

Expenditures must be equal to the amount of funds expended for participating public school students and teachers.

❖ **Same Start Date**

Services to private schools should ideally begin at the same time as services begin in public schools.

Equitable Services

The Basics

Key Word: Services

- Services and materials only.
- District maintains administrative control over services and materials.
- Districts do not distribute federal funds directly to private schools.
- No reimbursement to private schools.
- District monitors teachers and providers who deliver services.

At-a-Glance: Equitable Services Timeline

Public School District reminds private schools the Intent to Participate form is open, assist in completion of application if needed

Begin to set up initial consultation meetings with participating private schools

Spring

Spring/Summer

Fall

Winter

Spring

Summer

Agreed Upon Services begin, ideally when intervention services begin in public schools

Data collection, review of effectiveness of services

Continue consultations, complete required documentation during initial consultation

Using OSPI list, contact out-of-district private schools and identify eligible students

District review implementation fidelity and effectiveness of services to date

If needed, review effectiveness of services from previous year, discuss plans for upcoming school year



Equitable Services—A Cyclical Process

School District	Private School
	Private School Approval <ul style="list-style-type: none"> Annual approval process with the Washington SBE
Notification of Private Participation in Federal Programs Application—<i>Opens mid-March and closes April 2024</i>	
<ul style="list-style-type: none"> District contacts private schools that have not completed their intent to participate via the Private Participation in Federal Programs application—<i>mid-March–April</i> School district completes Contact Log in EDS application 	<ul style="list-style-type: none"> Private school identifies the federal programs they would like to participate in by completing the Private Participation in Federal Programs application in EDS by <i>due date–April</i> Identify Fall 2023 low-income student counts
Initial & Ongoing Consultation Process	
<ul style="list-style-type: none"> Begin initial consultation—<i>Spring</i> District contacts private school for identification of eligible students or other data related to programs (Title I-A, Title I-C, Title III)—<i>Spring</i> District and private school continue consultations to identify services and possible service providers—<i>Spring/Early Fall</i> 	<ul style="list-style-type: none"> Participate in initial consultation—<i>Spring</i> Provide appropriate and timely student data upon request of the district—<i>Spring</i> District and private school continue consultations to identify services and possible service providers—<i>Spring/Early Fall</i>
Delivery of Services	
<ul style="list-style-type: none"> District secures and initiates services—<i>Early Fall</i> District monitors services and consults with private schools <i>throughout school year</i> to ensure services remain appropriate 	<ul style="list-style-type: none"> Private school provides student data related to specific program requirements for services (achievement data, language assessment data) to begin services—<i>Early Fall</i>
Evaluation of Services	
<ul style="list-style-type: none"> District, private school, and service provider evaluate success of services—<i>Ongoing</i> 	<ul style="list-style-type: none"> District, private school, and service provider evaluate success of services—<i>Ongoing</i>

Federal Programs Available for Equitable Services

Detailed [program descriptions](#) are on OSPI's [Private School webpage](#).

Program	Services	Services Based On
Title I, Part A	Academic services for struggling students who would have attended a public Title I, Part A school where the student lives. Level of funding for services identified by number of eligible students whose families meet low-income criteria.	Student Eligibility
Title I, Part C	Academic services for migratory students and professional development (PD) for teachers of migratory students.	Student Eligibility
Title II, Part A	Professional learning activities for private school teachers and other education personnel.	Student Enrollment
Title III, Part A	Academic services for students who are English Learners (ELs) or Immigrant Children and Youth, and PD for their teachers.	Student Eligibility
Title IV, Part A	School-level services that support a well-rounded education, improved conditions for student learning, and improved use of instructional technology.	Student Enrollment
Title IV, Part B	Competitive grant program that provides academic enrichment through community learning centers for students of high poverty areas.	Competitive Grant Awardee Catchment Area/Student Eligibility
Carl D. Perkins	Opportunities for secondary students to attend CTE classes in public schools, and PD for private school CTE teachers.	Secondary Students/Teachers



OSPI Procedures for Participation in in Equitable Services

Eligibility for Participation In Equitable Services

Private schools may participate in federal program equitable services in school year 2024–25 if they:

- Are a state approved, non-profit, elementary or secondary school certified through the Washington State Board of Education (SBE).
- Complete the intent to participate portion of the **Private Participation in Federal Programs Application** in EDS which opens **mid-March** and is **due in mid-April 2024**.

Private School Responsibilities

Accessing the Application

The application (intent to participate in federal programs) is in OSPI's [Educational Data System \(EDS\)](#).
See the [EDS Log-In Instructions](#) to get started.



WASHINGTON STATE
OSPI Office of Superintendent
of Public Instruction

Home My Applications Profile

- > Application List
- > Application Roles
- > Education Directory
- > EDS Directory
- > Security Manager List

My Applications

My Application List

i The CTE Application section (Applic

You have access to the applications listed below

If you need access to more applications, please

Application
E-Certification
Education Data System
Education Data System Administration
Events Manager
Honors Award Nomination
iGrants
Learning Assistance Program
NBPTS Scholarship
pdEnroller
Private Participation in Federal Programs
Program Monitor

Private School Responsibilities

Accessing and Completing the Application

Each year, private schools must indicate their intent to participate through the **Private Participation in Federal Programs Application** in EDS.

1. Log into EDS: <https://eds.ospi.k12.wa.us>. If you do not have an EDS account, click the Create an Account tab and follow the instructions. Then go to step 4 below.
2. Enter your username and password.
3. Click Login. You will be asked to agree to the conditions of using EDS. Click on I agree.
4. Click on the tab "My Applications."
5. Next, click on the link for Private Participation in Federal Programs.

Private School Responsibilities

Accessing and Completing the Application

If the application does not appear in your list of applications, email customersupport@k12.wa.us with the following:

Subject: Access to Private Participation in Federal Programs Application

Body: I am requesting access to the Private Participation in Federal Programs Application in EDS.

Provide your first, middle, and last name, DOB, EDS Account Username, and the private school's organization (building) code.

Private School Responsibilities

Accessing and Completing the Application

See detailed [Private school directions](#) for private schools participating in federal programs.

1. Enter Federal Tax ID number.
2. Choose Participation or Nonparticipation.
3. Check federal program boxes to indicate participation in specific programs.
4. Enrollment data is pre-populated based on October 2023 data.
5. Complete low-income student enrollment (use October 2023 data) if Title I, Part A is selected to participate.
6. Select the school districts where your students reside (necessary for Title I-A and Title IV-B).

Important! Submit the application even if the private school chooses non-participation. Enter accurate data for each item. Once submitted, the application cannot be modified by the private school.

School District Responsibilities

School districts will be notified when the application opens in mid-March via GovDelivery.

Find [detailed district directions](#) on [OSPI's Private School Webpage](#).

Private School Participation in Federal Programs

The students, parent/guardians, and educators of non-profit, private schools–approved by the [Washington State Board of Education](#)–may be eligible for services provided through some Elementary Secondary Education Act (ESEA) federal education programs. These services can provide a valuable supplement to the core programming and professional development of participating private schools.

Program Basics	+
School District Requirements	+
Private School Requirements	+
Federal Programs & Non-Regulatory Guidance/Legislation	+

[Subscribe to receive Private Education and Title I, Part A email updates.](#)

Participation in Federal Programs Webinar

OSPI's Federal Program Equitable Services Ombudsmen hosted a webinar focusing on the requirements and procedures for school districts and private schools for the 2022–23 school year.

School District Responsibilities

Districts can log into [EDS](#) and go to the go to the Private Participation in Federal Programs Application to view past year and current year information for private schools in their boundaries.

In the application, use the **Detail View tab** to see information about the private schools including:

- Non-Participating Schools
- Participating Schools (applications are complete)
- Schools Not Applied (applications have not yet been completed by private school)

School District Responsibilities

After Private Participation in Federal Program application opens for the 2024–25 application and **BEFORE the application closes to private schools**, districts are required to contact private schools in their district’s boundaries to notify them that the application is open and to assist them in completing the application of requested.

- Districts **MUST** make at least three attempts to contact each private school prior to the close date of the application.
Districts are required to log all attempts in the *Contact Log*.
- Districts must make these attempts at contact using various methods, ex: emails, phone calls, letters, etc.
- If a private school does not respond after two attempts to contact, districts must send the private school a certified letter. If the private school does not respond, it will be considered non-participating.

School District Responsibilities

Required Documentation

Upload ESSA required documentation under the "CONSULTATIONS" tab for in-district participating private schools.

Select Organization Application Status Equitable Services Set-Aside **Consultations**

Private School Participation in Federal Programs

Consultations

The Consultations page only displays private schools that have submitted an Intent to Participate participating in federal programs. Please contact Julie Chace at julie.chace@k12.wa.us or 360-72

School Year: 2021-2022 ▾

District: -- Select One -- ▾

Search

For each participating private school:

- Enter Dates of Consultation.
- Upload the signed [Affirmation of Consultation](#)
- Upload the signed [Title I, Part A Record of Agreed Upon Services](#), if applicable.
- If there is a change in participation or other information, enter a comment in the comment box.

Consultation Process Best Practices



Washington Office of Superintendent of
PUBLIC INSTRUCTION

Consultation Process is Key!

Timely and Meaningful

Every spring, districts must begin planning to initiate timely and meaningful consultation with private schools that have indicated they want to participate in federal programs.

Remember!

- The goal of the consultation is to reach agreement on how to provide equitable and effective programs for eligible private school children and teachers.
- **Timely** consultation should occur before the district makes any decisions about opportunities for private school students' and teachers' participation.
- **Meaningful** consultation includes the genuine opportunity for private schools to express their views. The district may initiate consultation with a proposal for services.
- **Ongoing** consultation should continue throughout the implementation and assessment of services.

Consultation Process is Key!

Timely and Meaningful

- Consultation must occur **before** the district makes any decisions that affect the opportunities available to private schools.
- Private school views must be given serious, due consideration during the consultation process.
- If the district disagrees with the private school on any topic subject to consultation, the district must provide, in a timely manner, a written explanation of the reasons they disagree, however, all final decisions rest with the district.

Reminder! Sending a letter describing equitable services is not considered an adequate consultation. Likewise, a letter describing the services that a district intends to provide, without any prior consultation, is **not** sufficient to meet the consultation requirement.

Consultation Documentation

During the initial consultation with participating private schools:

- Use the [Affirmation of Consultation](#) as a guide for what topics to discuss. This document covers all federal programs.
- If the private school chooses to participate in Title I, Part A, begin discussing these services using the [Title I, Part A Record of Agreed Upon Services](#), as a guide for discussion.
 - The Title I, Part A Record of Agreed Upon Services may be completed and finalized at a subsequent consultation.

*ESEA requires this documentation be completed and submitted to OSPI.

Consultation Documentation

During the initial Consultation, private schools should affirm that:

District explained if there is a transfer of funds from one federal program to another.
(See more on Transferability on Slide 29)

An initial program of equitable services was designed.

Timely and Meaningful consultation occurred.

Complaint procedures were explained.

Initial Consultation

Additional Required Topics for Discussion

Identification of student's need, using data.

What services will be offered.

How, where, and by whom the services will be provided.

How the district will academically assess these services.

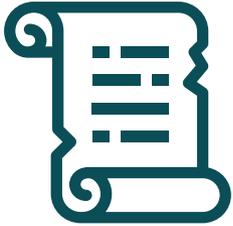
How the results of this assessment will improve future services.

Size and scope of equitable services the district will provide.

How much funding is available to serve private school students, teachers, educational personnel, and in some cases, parents, and if the funds will be pooled.



Ongoing Consultation-Process



Consultation

The district is responsible for making “**timely and meaningful**” connections with the private schools located within their district boundaries, **AND** outside of district boundaries if they have indicated they want to participate in Title I, Part A equitable services.



Working Together

Decisions regarding services and the evaluation process are agreed upon through consultation to ensure timely, appropriate, and meaningful supplemental services to eligible students, teachers, and families for each private school. One size does not fit all!



Structured Support/Ongoing Monitoring & Evaluation

Districts continue to provide support throughout the school year by monitoring the services, providing adjustments as needed, and evaluating impact.





Monitoring and Evaluating

Determine with private schools the standards and annual assessments for measuring progress of the program.

Define annual progress. Determine criteria for making program modifications if progress is not being achieved.

Provide ongoing support as needed. Assess the achievement of current year's program-did the services result in the agreed upon and expected outcomes?



Initial Consultation

Discussing Transferability

- Consult with private schools **before any decisions are made** that could affect the ability of private schools to benefit from programs for which they are eligible.
- Private school students and teachers must receive equitable services under the programs that the funds are transferred to.
- Eligible programs to transfer into other federal programs include:
 - ✓ Title II, Part A-Professional learning activities for private school teachers.
 - ✓ Title IV, Part A-School-level services that support a well-rounded education, improved conditions for student learning, and improved use of instructional technology.

Title I Guidance

Out-of-District Services Interlocal Agreements



Out-of-District Guidance for Title I, Part A Services

Title I, Part A requires districts to provide equitable services to eligible students that attend a private school outside the district's boundaries, but that reside in a Title I served attendance area in the district's boundaries.

Districts must contact these out-of-district private schools to determine if there are eligible students. Communication strategies with private schools outside a district's boundaries may vary and districts are encouraged to work with the private schools and the "home" districts of the outside private schools.

- After the Private Participation in Federal Programs application closes in April, OSPI sends the list of private schools outside the district's boundaries that may have eligible students.
- Use this list to determine which private schools to contact.
- Work with the private school to identify Title I eligible students.

NOTE: please do not use the "out-of-district" report in the EDS application to generate your own report. This report often does not reflect the most up-to-date data.

Out-of-District Guidance

Interlocal Agreements

- If a private school has eligible students from more than one district, they may pursue an interlocal agreement to arrange for one district to provide Title I, Part A services to all eligible private school students. [See our website for example interlocal agreements.](#)
- Determining who and how the services are provided is based on the agreement between the districts and the private school. When a district provides services on behalf of another district, an interlocal agreement outlining the period of performance, program requirements including services, funding, payments, reporting, and records maintenance is established

Reminder for Title I, Part A

❖ For Title I, Part A Funding for services is generated by...

- Identify private school students who reside in a Title I-served public school attendance area.
- Of those students, identify the number of students whose families meet the low-income criteria.
- Students who meet both criteria **generate** funding for Title I services.

❖ Who receives services?

- Services can be provided to all students who reside in the Title I public school attendance area and are failing, or most at risk of failing to meet the state's academic achievement standards.
- Students do not need to meet the low-income criteria to receive Title I, Part A services.



Need Assistance?

Consultation Disagreements

If the private school believes timely and meaningful consultation has not occurred or the district did not give due consideration to their views, they should first contact the school district to discuss these concerns.

OSPI Ombudsman

If the concern is not resolved satisfactorily, the private school should contact the OSPI Federal Program Ombudsman for assistance.

Complaint Procedures

If the concern is still unresolved, the private school has the right to file a complaint with OSPI. See [Complaint Procedures for Private Schools.](#)





Private School Yearly Approval/Renewal Process Washington State Board of Education

Private School Annual Approval Washington State Board of Education (SBE)

Reminder! The private school annual approval/renewal process is completed through the SBE and not the same as the Private Participation in Federal Program application.

For questions regarding the annual approval process for private schools, contact SBE at 360-725-6433, or Privateschools@k12.wa.us.

Private School Annual Approval

SBE-Change of Private School Information

Private Schools can make a change to their name once a year, during the yearly application approval process through SBE. During the rest of the year, schools will use an online form to change information.

To notify SBE of changes to the school's physical address, the Head of School, or contact information for the school use the [Private School Change of Information Form](#).

- Username: To log in, you will use the email address of your Head of School submitted on your most recent approval application.
- Password: Your School's Building Code.

If you have trouble logging in, please contact Nicole Mulhausen, PrivateSchools@k12.wa.us.



Federal Program Contacts, Webpages, Additional Resources

Federal Program Webpages and Contact Information

Federal Program Webpage	Email	Telephone
Title I, Part A Office	title1a@k12.wa.us	360-725-6100
Title I, Part C-Migrant Office	sylvia.reyna@k12.wa.us	360-725-4474
Title II, Part A Office	title2a@k12.wa.us	360-725-6340
Title III Office	kristin.percycalaff@k12.wa.us	360-725-6145
Title IV, Part A Office	a.tinnin@k12.wa.us	360-972-0974
Title IV, Part B Office	heidi.schultz@k12.wa.us	360-819-0045
Perkins/CTE Office	cte@k12.wa.us	360-725-6245

Equitable Services to Private Schools

Additional Resources

- [OSPI's Private School Equitable Services Page](#)
- [Title I, Part A Non-Regulatory Guidance](#)
- [Title VIII Non-Regulatory Guidance](#)
- [Title I, Part A Year-at-a-Glance 2023–24](#)

Are there any questions you still have that we can answer now?

If you have further questions or would like to provide any feedback regarding today's webinar, please email us.



Julie Chace, 360-725-6167, julie.chace@k12.wa.us

Sheila Gerrish, 360-725-6026, sheila.gerrish@k12.wa.us

Thank you for joining us today!



Washington Office of Superintendent of
PUBLIC INSTRUCTION