

The background features a collage of two images. The top-left portion shows a line of yellow school buses, with the word 'SCHOOL BUS' and the number '32' visible on the front of one. The bottom-left portion shows a classroom with blue walls, decorated with colorful balloons and framed pictures. Several desks and chairs are arranged in the room.

Title I, Part A District Coordinator Webinar

Jan. 25, 2024

Logistics

- Submit questions or comments in the chat or send an email to erin.sudduth@education.ky.gov.
- The webinar will be recorded and posted on the [Title I Documents and Resources webpage](#).

Recap from December Webinar

- Announcements and reminders
- December newsletter highlights
- Introduction: Public Consulting Group (PCG) and Title 1 Next
- Planning for revised allocations
- Upcoming release of census data
- Census poverty percentage v. district poverty percentage

Agenda

- Announcements and reminders
- Equitable services overview
- Eligible private school students
- Private school intent to participate
- Private school consultation and services

Announcements and Reminders

- A census poverty and hold harmless percentages for the 2024-2025 school year are available on the [Title I, Part A Documents and Resources](#) webpage. These data can be used to begin planning for the 2024-2025 school year.
 - Keep in mind that all numbers are tentative and subject to change.
 - A local educational agency (LEA) official may contact the Small Area Income and Poverty Estimates (SAIPE) branch at the U.S. Census Bureau for further information on how to challenge these data. The challenge period ends on March 13, 2024.
- Monitor the obligation of 310K funds to ensure you're on track to meet the 15% carryover limitation.
 - If approximately 39.66% of 310K funds are obligated by January, the district is on track to meet the 15% carryover limitation.

In This Month's Title I Newsletter

- Make sure you didn't miss our [January Title I newsletter!](#)
 - Get ready to streamline administration of your district's Title I program!
 - Person Role Manager updates
 - Title I resource overview
 - In Case You Missed It – Annual parent and family engagement feedback survey
 - Professional learning opportunity: The Bruman Group's Education Department General Administrative Guidelines (EDGAR) Academy

Equitable Services

- The Every Student Succeeds Act (ESSA) requires districts to annually offer equitable participation in Title I, Part A **services** to each private school that has children from participating Title I, Part A attendance areas.
 - Title I, Part A provides services to eligible private school children, not funds to private schools.
- Private schools located within or outside the district are eligible to receive Title I, Part A services.
- Home schools are treated as private schools in Kentucky.

Eligible Private School Children

- [34 CFR 200.62\(b\)\(1\)\(i\)](#) defines eligible private school children as children who reside in a participating Title I public school attendance area of a local education agency (LEA), **regardless of whether the private school they attend is located in the LEA.**
- The LEA in which a child resides is responsible for providing services to the child.
- The funds generated for services by these students can cross a district's geographic boundaries. These funds must be used to provide services to students from the district in which the funds were generated.
- This is unique to Title I, Part A.

Intent to Participate

- Every school year (late winter/early spring), the district must contact officials from all private schools serving students in participating school attendance areas.
- A sample letter of notification and participation survey are available in the Title I, Part A Sample Documents folder on our webpage.
- The district may set a reasonable deadline, taking into consideration private school schedules, for private schools to indicate their intent to participate.
 - Be sure to provide clear and sufficient notice of the deadline and identify potential consequences for not meeting the deadline.

Notifying Private Schools Outside the District

- The district has a responsibility to contact private schools outside the district if the LEA has reason to believe students who reside in a participating Title I public school attendance area attend those schools.
- The LEA may not be aware of every instance in which a student who resides in a participating Title I public school attendance area attends a private school outside of the district.
- If a private school has students it believes may be eligible for Title I services because they reside in a participating Title I public school attendance area in another LEA and the private school has not been contacted by that LEA, it would be prudent for private school officials to contact the LEA directly in order to ensure that their eligible students are considered for Title I services.

Documenting the Notification

- The method used to notify private schools is at the district's discretion; however, the notification should be documented.
- In the event the district is selected for monitoring, KDE will ask to see dated communication inviting private schools to participate in services.
 - Certified mail
 - Email with a read receipt
- Districts are not required to submit completed intent to participate forms to the Kentucky Department of Education (KDE).

Intent to Participate v. Declaration of Participation

Intent to Participate

- Applies to Title I, Part A.
- For private schools serving students who reside in participating school attendance areas.
 - May include private schools physically located outside the district's geographic boundaries.
- Information on participating private schools will be included in the Title I, Part A application.

Declaration of Participation

- Applies to Title II-A, Title III, Title IV-A and IDEA-B.
 - Private school membership data directly impacts the per-pupil dollar amount allocated to districts for Title III and IDEA-B.
- For private schools physically located within district's geographic boundaries.
- Completed by districts in the Application Supplements in the Grant Management Application and Planning (GMAP) system.

Consultation

- Districts are required to provide “timely and meaningful consultation” to eligible private schools that elect to receive services.
 - This occurs between district officials that represent the Title I program and private school officials that will help with the consultation process.
- Districts and private school officials “shall have the goal of reaching agreement on how to best provide equitable and effective programs to eligible private school children.” [ESSA 1117(b)(1)]
- A list of consultation topics is available on pages 37-38 of the [Title I Handbook](#).

Notification and Consultation Timeline

- The district must initiate the consultation process.
- Consultation must include early discussions to prepare for the next school year so that there is a timely start to the Title I program.
 - KDE suggests consultation occur in March or April.
- Consultation must occur during the design and development of the Title I program and before the district makes any decisions that affect the opportunity for eligible private school children, their teachers and their families to participate in the Title I program.
- Consultation must be ongoing throughout the school year to ensure effective implementation, service delivery and assessment of equitable services. [ESSA 1117(b)(3).]
 - Title I services being provided at private schools are the responsibility of the district and should be monitored just as the district monitors services at public schools.

Consultation Agreement Form

- KDE's [Equitable Services Consultation Packet](#) must be used during consultation meetings to guide the conversation between the district and the nonpublic school. The packet contains:
 - A needs assessment for each federal program
 - A “Nonpublic School Consultation Agreement”
- Jointly complete the applicable needs assessment(s) with the nonpublic school.
- Maintain signed copies of the forms at the district office.
 - The completed, signed packet(s) must be uploaded to the GMAP District Document Library when the FY2025 consolidated application opens.

How Funds are Generated for Private Schools

- In order to generate Title I, Part A funds for equitable services, a private school student must:
 - Reside in the LEA's participating Title I public school attendance area; and
 - Be from a low-income family.
- If there are no students from low-income families attending a private school, no funds are generated for that private school.
- The number of low-income students residing in a participating Title I public school attendance and attending participating private schools is documented on the School Eligibility page in GMAP. GMAP automatically calculates the equitable share of funds.
- Low-income status is not a requirement in order to receive Title I, Part A services.

Timeframe for Obligation of Funds

- ESSA 1117(a)(4)(B) states, “Funds allocated to a local educational agency for educational services and other benefits to eligible private school children shall be obligated in the fiscal year for which the funds are received by the agency.”
 - Helps ensure funds are used to provide services to the students who generate them.
- If the LEA is providing equitable services as required and meeting the obligation of funds requirement, it generally should not have any, and certainly not significant, carryover.

Establishing Reasonable Deadlines

- During the consultation process the district may establish reasonable deadlines on private school officials to facilitate meeting the obligation of funds requirement.
- If a deadline is established in consultation and in the context of the requirement to obligate funds generated for equitable services in the current fiscal year, it would be reasonable for the district to inform private school officials that, if the deadline is not met and the private school officials have not notified the district of obstacles to meeting the deadline in a timely manner, the district may consider the private school to have declined services.
- The required ongoing consultation between the district and private school will help prevent this situation from occurring.

Private School Students Eligible to Receive Services Example

- Private School A is located in District A and has an enrollment of 500 students residing in Districts A, B and C.
- 55 students from Districts A and B generate Title I funds.
- Who is eligible to receive services...
 - From District A?
 - From District B?
 - From District C?

District	Number of students enrolled in Private School A	Number of low-income students from Title I-served schools
District A	250	40
District B	200	15
District C	50	0

Providing Services to Private School Students Outside the District

- The district may choose to provide services themselves, as they do for participating private schools located within the LEA.
- Although the LEA in which the child resides is responsible for providing services to the child, it may arrange to have services provided by the LEA in which the private school is located and reimburse that LEA for costs.
 - In the event another district will be providing services, both districts should participate in the consultation process to ensure appropriate services are being provided.

Equitable Services Frequently Asked Questions

Question

[Providing Equitable Services to Eligible Private School Children, Teachers, and Families Non-Regulatory Guidance](#)

Reference

May an LEA implement a schoolwide program in a private school?

C-8

Who is responsible for planning and designing equitable services?

C-12

What types of services are available to private school participants?

C-15

May an LEA just provide a private school with materials and supplies?

C-19

When must Title I services for private school participants start?

C-20

May private schools arrange Title I services and activities submit an invoice to the LEA for reimbursement?

C-37

Questions?

Upcoming Webinar Dates

- Thursday, Feb. 29, 10-11 a.m. ET
- Thursday, March 28, 10-11 a.m. ET
- Thursday, April 25, 10-11 a.m. ET
- Thursday, May 30, 10-11 a.m. ET
- Thursday, June 27, 10-11 a.m. ET
- Thursday, July 25, 10-11 a.m. ET