



Equitable Services Overview

Collaboration between LEAs and Private School Officials

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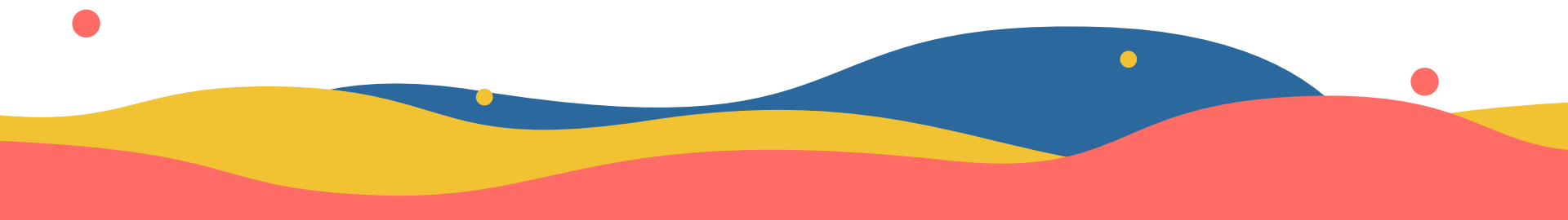
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Equitable Services Background



Definition of Equitable Services

The Elementary and Secondary Education Act (ESEA) requires a participating Local Educational Agency (LEA) to provide eligible children attending private 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. These services are considered to be assistance to students and teachers and not to private schools. While the Arkansas Department of Education (ADE) provides funding to LEAs for entitlement services to students attending private schools who choose to accept funding and abide by the regulations of such funding, the ADE does not accredit or provide oversight of private schools.





What Federal Programs Provide Equitable Services?

Title I Part A - Educational Assistance to At-Risk Students

Title I, Part C - Education of Migratory Children

Title II, Part A - Professional Development/Supporting Effective Instruction

Title III, Part A - Language Instruction for English Learners and Immigrant Students

Title IV, Part A - Student Support and Academic Enrichment Grants

Title IV, Part B – Nita M. Lowey 21st Century Community Learning Centers (21st CCLC)



Equitable Services & Eligibility

Title I, Part A: Educational Assistance to At-Risk Students: Title I, Part A provides supplemental educational services for eligible private school students in need of instructional support who are educationally disadvantaged and failing or most at risk of failing to meet high academic standards. **The funding formula is based on the number of students identified as low-income. Eligible private school students must live in the Title I participating public school attendance area.**

Title II, Part A: Professional Development/Supporting Effective Instruction: The goal of the Title II, Part A, program is to provide assistance for preparing, training, recruiting and retaining high quality teachers, principals, and other school leaders. Funds are made available to improve teaching and student learning, addressing specific student needs. Activities include the provision of sustained and intensive evidence-based professional development that can help students achieve high academic standards. **The funding formula is based on K-12 private school student TOTAL enrollment data. Funds are only available from the district in which the private school is located.**

Title IV, Part A: Student Support and Academic Enrichment Grants: The Title IV, Part A, program is intended to increase the capacity of local educational agencies, schools, and local communities to provide all students with access to a well-rounded education, improve school conditions for student learning, and enhance the use of technology in order to improve the academic achievement and digital literacy of all students. **The funding formula is based on K-12 private school student TOTAL enrollment data. Funds are only available from the district in which the private school is located.**



Equitable Services & Eligibility

Title I, Part C: Education of Migratory Children: Title I, Part C supports educational programs and services that address the unique needs of migratory children (the children of migrant agricultural/fishery workers). Supplemental instructional services are designed for eligible students who are most at risk due to their high mobility and/or limited proficiency in English. **Services are based on the migratory status of eligible students and are only available from the district or co-op in which the private school is located.**

Title III, Part A: Language Instruction for English Learners and Immigrant Students: The Language Instruction for English Learners (EL) and Immigrant Students program provides funds for helping EL students attain English proficiency and meet the same challenging State academic standards required of all students. Supplemental educational services for eligible private school students who are identified as English Learners may be provided. Qualification criteria will be discussed during consultation. Funds may also be used to provide professional development to teachers of English Learners. **The funding formula is based on K-12 private school EL student data. The school district must have qualified for this grant. Services are based on the EL and/or immigrant status of eligible students.**

Title IV, Part B: 21st Century Community Learning Centers (CCLC): The 21st CCLC program is a competitive program that supports the creation of community learning centers that will provide academic enrichment opportunities during non-school hours for children, particularly students who attend high-poverty and low-performing schools. The program helps students meet state and local standards in core academic subjects, such as reading and mathematics; offers students a broad array of enrichment activities that can complement their regular academic programs; and offers literacy and other educational services to the families of participating children. **The school district must have qualified for this grant. The private school must be located within the public school attendance area.**



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Making Contact

What private schools need to be contacted by the LEA?

- Private schools have to be a **nonprofit organization** or run by a nonprofit organization.
- LEAs MUST contact all private schools within their district.
- LEAs also need to contact any private schools outside their district if they have reason to believe that students who live in their attendance zone attend those schools.
- Private schools may open without the LEA's knowledge, and sometimes an LEA isn't aware of a student that lives in their attendance zone and attends a private school outside their district. Due to this, if an LEA has not contacted a private school, the private school should contact the LEA directly if they believe they have students eligible for services.
- LEAs MUST contact each private school in their district (and those outside their district that may have eligible students) EVERY YEAR, even if they have denied services in the past. Send an email, make a phone call, send a certified letter...document 3 good-faith attempts.

What happens when a • new private school opens?

If a private school opens after the LEA's deadline for indicating an intent to participate in equitable services, the LEA is not required to provide services for that intended year, but they may.

Begin developing a relationship. The private school can send an email introducing themselves. The LEA could extend an invitation to the private school staff to attend any professional development opportunities.

During initial consultation time, the LEA will then send an invitation to the private school officials to have that consultation. If a relationship has already been established, it makes consultation time smoother.



Help With Identifying Private Schools

Private schools can open and close without ADE's knowledge, so LEAs should keep their eyes and ears open to stay informed of any new private schools in their area.



ADE List of Known Arkansas Private Schools by County

LEAs can use this list as a starting point for contacting private schools. It will be updated annually. If you know of a school not on the list, or you know that one has closed, please let me know so I can make updates.



Arkansas Public Schools and Districts Map

If you are unsure what attendance zone a private school is located in, use this map for help.



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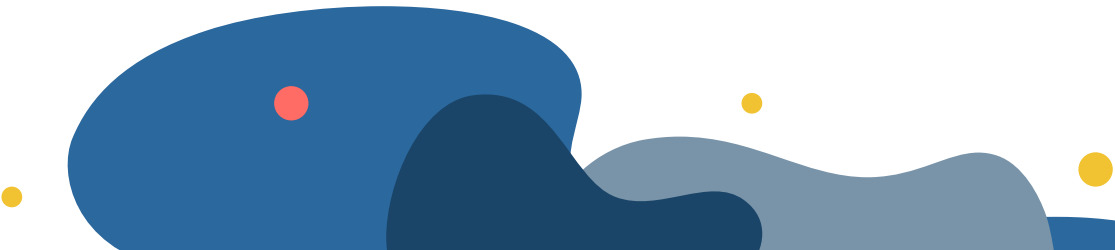
Consultation & Timeline



When should consultation take place?

ALL YEAR. Consultation is not just a one time event. It is an ongoing collaboration between LEAs and private school officials to help our kids.

Services for private school students should begin at the same time as services for public school students in order to be equitable (beginning of the school year). This is why the **INITIAL** consultation needs to occur in late winter/early spring prior to the school year of the services being planned.



Let's take a
look at a
suggested
timeline.



Suggested Consultation Timeline for LEAs

January/February

- Identify private schools that need to be contacted for the next SY.
- Contact private school officials to set up a consultation calendar for the upcoming school year.
- In January-February, determine final equitable services allocation using Federal Grants Management.
- Provide equitable services program funding figures to participating private school officials.

March

- Update Data collection for the next SY (if needed)
- Initial consultation meeting.
 - Provide a general overview of programs that will be available to non-public students and teachers in the next school year (Affirmation of Consultation Information Sheet).
 - Consult with private school officials to identify students' and teachers' needs (needs assessment), discuss services and estimated funding figures, design programs, and establish priorities and deadlines for the next school year (Complete and sign Affirmation of Consultation Form).
 - A more in-depth overview of what should be discussed during initial consultation will be discussed later.

• Suggested Consultation Timeline for LEAs cont. •

April

- Update Data collection for next SY (if needed)
- Complete plans for programs and services for the upcoming school year.
 - Don't wait until the last minute. Always keep in mind that services for private schools should begin at the same time services for public school students start in order for them to be considered equitable.
- Identify students to participate.
 - The low-income students who generate the funding for Title I equitable services may or may not be the most at-risk students who receive services.

May

- May 1st is the deadline for the ADE Affirmation of Consultation with Private Schools form. It should be uploaded in Indistar in the Form Uploads folder for the year of services. (Ex. The consultation form for the 2024-25 school year will be uploaded in the 2024-25 Form Uploads folder.) A form is required for each private school, participating and nonparticipating.

June/July

- Finalize actions related to programs and services.

Suggested Consultation Timeline for LEAs cont.

August

- Determine preliminary equitable services allocations based on the number of eligible students (data from the Affirmation of Consultation sent to ADE on May 1st).
- The preliminary Equitable Services allocation amounts will be posted on the ADE website (Federal requirement).
- Provide equitable services program funding figures to private school officials.
 - Determine how LEAs and private school officials will communicate funding updates throughout the year.
- Establish service start date (the same as the public school start date).
- Finalize the roster of participating students.

September

- Make update student roster if needed.
- Begin services.
- Begin professional development and parental involvement activities.
- Update Data collection for next SY (if needed)

• Suggested Consultation Timeline for LEAs cont. •

October through June

- Ongoing communications with private school officials about the status of current programs and services.
- Update Data collection for next SY (if needed)
- Conduct professional development and parental involvement activities.
- Assess student progress and evaluate program effectiveness.
- Make suggestions for modifying programs that will be implemented in the next school year.

In order to provide the best services for our kids, it is crucial that the communication is ongoing throughout the entire school year. When good relationships are built, any issues or problems that arise can be discussed and solved with a lot more ease. Don't forget to document everything throughout the year.

Discussion Topics at Consultation

- Identification of children's needs, connected to the school's **needs assessment**.
- What **services** will be offered. Services, including materials and equipment, must be secular, neutral, and non-ideological.
- **How, where, and by whom** the services will be provided.
- How services are **assessed** and how the results of the assessment will be used to improve those services.
- The size and scope of the equitable services provided to eligible private school children, teachers, and other educational personnel.
- The **proportionate share** of funding allocated for services and how the funding allocated is determined.
- How and when decisions about delivery of services will be made and how the private school will be notified of those decisions.
- Whether services shall be provided by the school district directly or through a separate government agency, consortium, or entity, or through a third-party contractor.
- Whether to provide equitable services to eligible private school children by pooling funds allocated for the program's purpose.

Discussion Topics at Consultation cont.

- Administrative costs of providing equitable services; indirect costs.
- Services and activities for **teachers** of participating private school students.
- **Family engagement** activities.
- Any funds available for **carryover**.
- **Transfer of funds** from one program to another and implications for private schools.
- What **methods or sources of data** will be used to determine the number of children from low-income families in participating school attendance areas who attend private schools for Title I.
- How, if the LEA disagrees with the views of the private school officials on the provision of services through a contractor, the LEA will provide in writing to the private school officials an analysis of the reasons for the decision.
- **When** services will be provided (including the approximate time of day).
- Whether to coordinate and use Title I funds for equitable services with other applicable Title I programs.

Documentation



LEAs should keep detailed records on site so they are accessible for any monitoring purposes. The following records should be kept on file:

- Copies of letters annually informing private schools of the right to participate in the Title programs, invitations sent to engage in consultation, as well as logs of follow-up phone calls and any responses received.
- Notes indicating topics discussed and any decisions made during consultation. Retain meeting agendas and sign-in sheets.
- Documentation identifying the needs of private school students, teachers, and families, as well as allocation amounts for services.
- Documentation of provided services, programs, and resources and how the program was evaluated for effectiveness. Include copies of contracts, purchase orders, invoices, etc.
- Documentation of annual inventory of all property located in private schools. This should include a description, amount, and location of all property, as well as the program and purpose of each item. **LEA's must maintain ownership/control of all property and materials.**
- If applicable, adequately addressed complaints from private school officials.

Affirmation of Consultation Form

- The Affirmation of Consultation with Private Schools form is **due by May 1st** for the following year.
- LEAs need to submit a Consultation **Form for every private school**, even if they do not wish to participate in equitable services or did not respond after 3 contacts. There is a box to mark for each.
- Private schools need to check the box stating they are a nonprofit corporation. If the business name listed under the Secretary of State differs from the “Name of Private School” on the form, please list the name of the nonprofit corporation.
- If the private school does not wish to participate in equitable services for the year, that box needs to be checked and no other information is needed.
- **Please check eligibility of services and communicate which Titles the private schools are eligible for during consultation in order to have accurate data.**
- Private schools need to provide school data on the form. **Eligible Title I students and total enrollment (for II & IV)** and any qualifying English learners or migrant students.
- If the LEA does not have any eligible private schools or eligible students in their attendance zone, please check the N/A box.

[SY 24-25 Affirmation of Consultation with Private Schools Form](#)



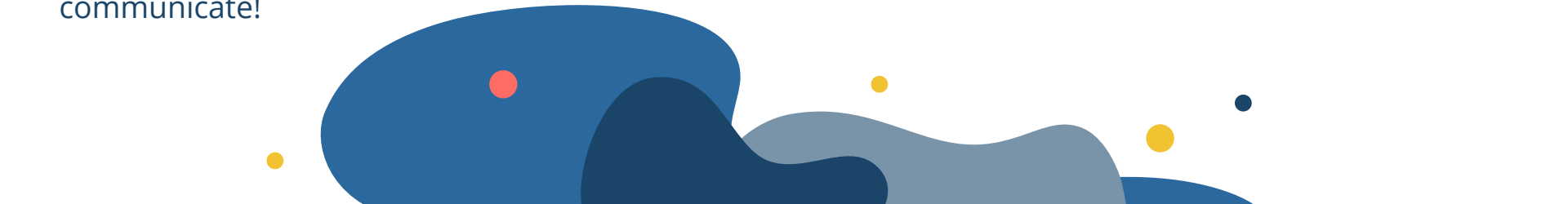


Deadlines for Submission of Requests

LEAs may set deadlines for private schools to submit requests for services and materials in order to meet their own accounting and budget deadlines as long as:

- The LEA has provided clear and sufficient notice of the deadlines.
- The LEA has identified potential consequences for not meeting the deadlines.
- The LEA has given adequate time for private school officials to gather the data and respond.

If the deadline is not met and no obstacles for meeting the deadline have been communicated by private school officials, the LEA can inform the private school officials that this could be considered as the private school declining services. If there has been ongoing consultation throughout the year and a solid relationship has been developed, though, this can easily be avoided. Communicate, communicate, communicate!





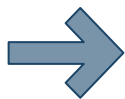
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Calculating Allocations

Title I Funds

- LEAs must determine the **proportional share** of Title I funds available for equitable services for eligible private school children based on the total amount of Title I funds received.
- The services and benefits provided to private school students and educators must be **equitable** in comparison to the benefits for public school students and educators.
 - No additional funds other than the proportional share may be set aside for equitable services.
- During the initial consultation, when determining preliminary allocations, **prior year data will be used** so the same data is used for public school and private school data.
 - For example, in planning for school year 2024-2025 allocations, an LEA would use its participating Title I public school attendance areas or schools and the number of children from low-income families residing in those attendance areas using poverty data collected during the 2023-2024 school year. These preliminary allocations will be posted on the ADE website.

How does a private
school measure
poverty?



Methods to Collect Poverty Data from Low-Income Families That Attend Private Schools

- **The same measure of poverty used to count public school children.** (ex. Free and Reduced-Price Lunch-FRPL)
- **Comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable.** Since many private schools do not use the FRPL program, a survey to collect data could be used. An LEA may use poverty data for private school children that are from a different source than the data it uses for public school children as long as the income threshold in both sources is generally the same.
 - An LEA should not require that the private school officials give the names of low-income families in order to protect the identity of families of private school students.
 - The only necessary information that is needed is:
 - Verification of residence in a participating Title I public school attendance area
 - Grade level and age of each child
 - Income level of parents
- **Proportionality**
- **An equated measure**

Survey Example



Since most private schools do not use Free and Reduced Price Lunch, an income survey can be used to collect the poverty data.

This sample survey may be used (not required) to collect data if it is needed. Private school officials will send a survey out to their families to collect data.

Local Education Agency

Non-Public/Private School

Title I Non-Public Family Income Survey

The information gathered from this survey will help determine our school's eligibility for participation in Title I, Part A services for extra academic support for the **2023 – 2024** school year. The information requested below is confidential. You do not have to list student or family names.

Please complete and return this survey to the principal's/administrator's office as soon as possible. *Thank you for participating and supporting our school.*

1. How many students from your household attend this private school? _____
2. What grade is each student in? _____
3. Street Address (not P.O. Box) of household where student(s) reside: _____

4. Do any household members currently receive assistance through SNAP, TANF or FDPIR? ☐ yes ☐ no

if yes, STOP HERE. Students in your household meet the income element for Title I-A funding generation.

5. On the chart below, check the box indicating your Household Size (total adults and children who live there).

Household Income* – Qualification for Title I-A Funding (Continental U.S., D.C., Guam & territories)					
Effective from July 1, 2022 to June 30, 2023					
Household Size	Annual Income	Monthly Income	Twice per Month	Every 2 Weeks	Weekly Income
<input type="checkbox"/> 1	\$ 25,142	\$ 2,096	\$ 1,048	\$ 967	\$ 484
<input type="checkbox"/> 2	33,874	2,823	1,412	1,303	652
<input type="checkbox"/> 3	42,606	3,551	1,776	1,639	820
<input type="checkbox"/> 4	51,338	4,279	2,140	1,975	988
<input type="checkbox"/> 5	60,070	5,006	2,503	2,311	1,156
<input type="checkbox"/> 6	68,802	5,734	2,867	2,647	1,324
<input type="checkbox"/> 7	77,534	6,462	3,231	2,983	1,492
<input type="checkbox"/> 8	86,266	7,189	3,595	3,318	1,659
<input type="checkbox"/> ____ For each additional family member add ...	+8,732	+728	+364	+336	+168

6. For your Household Size, is your Household Income* equal to or less than the amount shown?

- ☐ **Yes**, for our Household Size, our Household Income is equal to or less than the amount shown.
- ☐ **No**, for our Household Size, our Household Income is greater than the amount shown.

*Household Income is "gross income": total income prior to any taxes/insurance/etc. being deducted. Household Income is the combined total income of all income-earners residing at the household and contributing to the household's expenses.

Calculating Title I, Part A Proportional Share

1. Determine the total number of children from low-income families **residing in each participating public school attendance zone** who attend public AND private schools from.
2. Determine the overall proportion of these children who attend private schools.
3. Finally, determine the amount of funds available for equitable services based on that proportion of the LEA's total Title I allocation.

EXAMPLE-DETERMINING THE PROPORTIONAL SHARE OF \$1,000,000 TITLE I ALLOCATION		
# of Public School Low-Income Children	# of Private School Low-Income Children	Total # of Low- Income Children
3000	20	3020
Proportionate Share: 99%	Proportionate Share: 1%	
\$993,377.48	\$6,622.52	

Calculating Title II & IV Equitable Services Allocations

Title II and Title IV allocations are determined using total enrollment of students in the private school, regardless of their resident district. When determining preliminary allocation amounts, prior year data will be used.

1. Determine the total LEA enrollment and the total private school enrollment; add together for combined total enrollment.
2. Subtract any admin costs from the total LEA allocation.
3. Determine a per pupil rate by dividing the LEA allocation by the total combined enrollment.
4. Multiply the per pupil rate by the private school enrollment to determine the amount of funds available for equitable services for Title II or Title IV.

EXAMPLE-DETERMINING TITLE II & TITLE IV EQUITABLE SERVICES FUNDING	
(A) Number of Students	
(A1) LEA Enrollment	15,600
(A2) Participating Private School Enrollment	400
(A3) Total Enrollment = A1 + A2	16,000
(B) Title II or IV Allocation	
(B1) Total LEA Allocation	\$200,000.00
(B2) Admin Cost	-
(B3) LEA Allocation minus Admin Cost = B1 - B2	\$200,000.00
(C) Per Pupil Rate = Cost Per Child	
(C1) Per Pupil = B3/A3	\$12.50
Equitable Services	
Amount LEA Must Reserve for Equitable Services = A2 x C1	\$5,000.00

● Equitable Services & Transferability

- Before a decision is made to transfer funds (for example, from Title II, Part A and Title IV, Part A into Title I, Part A), **LEAs *MUST have timely and meaningful consultation with private school officials*** to give due consideration to their views. The final decision to transfer funds lies with the LEA.
- If funds are transferred into Title I, those funds are subject to the proportional share for equitable services.
- LEAs are not able to transfer funds into Title I solely to provide services for private school students.
- LEAs may not retain funds in a program from which it transfer funds to Title I solely to provide equitable services.
- An LEA must provide equitable services based on the amount of funds the LEA is allocated for each program, after the funds are transferred. An LEA must provide private school students and teachers equitable services under the program(s) to which, and from which, the funds are transferred based on the total amount of funds available to each program after the transfer, if such programs are subject to the equitable services requirements under ESEA section 1117 or 8501.



Calculating Other ESEA Equitable Services Allocations

Equitable services allocations for Title programs are based on eligibility.

- Title I, Part C is based on the migratory status of eligible students.
- Title III is based on the number of identified and served English Learners.
 - Use the same formula listed for Title II and IV, but replace the total enrollment numbers of public and private school students with total eligible EL public school students and total eligible EL private school students.
- Title IV, Part B is based on the location of the private school within a public school attendance area.



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Use of Funds

Choosing Private School Students to Participate in the Title I program

- After the proportional share is determined, it is time to **select private school students** to participate in the Title I program.
- Poverty is not a criterion for eligibility of equitable services. **The low-income students who generate the funding for equitable services may or may not be the most at-risk students who receive services.**
- The LEA and private school officials will work together to determine multiple, **educationally related, objective criteria** to determine which private school students are eligible for services.
 - Criteria could include achievement tests, teacher referrals and recommendations, grades, and other educationally related criteria.
- From the list of eligible students, those in **greatest academic need** will be identified to receive services.

Equitable Services Funds Need to Know Information

- All decisions on the use of funds need to be collaborative and based on the private school's **needs assessment**. These needs could be different from the needs of the public school.
- **Supplement, not supplant!**
- An **LEA remains in control of the federal funds** and maintains title to materials, equipment, and property purchased with such funds.
 - LEAs should label property and equipment placed in private schools. These materials must be returned to the LEA when a program ends or when they are no longer needed to operate the program.
- Private school officials need to work with the LEA prior to any obligation of funds and to arrange for billing and payment of services, activities, and materials.
 - The LEA may wish to reimburse an individual(s) for costs associated with services and professional development or they may pay the costs directly.
 - Private schools CANNOT be reimbursed for costs.
 - All activities, including conferences, should be preapproved and the costs must be **reasonable, necessary, and tied to the private school's needs assessment**.
- The LEAs and private school officials should continue ongoing communication throughout the year to stay up to date on use of funds and account balances.

Title I Services

- Services may include, but are not limited to, the following:
 - Instructional services and tutoring provided by public school employees or third-party contractors
 - Services can be provided by private school teachers if the services occur outside of the time he or she is employed by the private school. Inquire about retired private school teachers that meet requirements.
 - Expanded learning time, including before- and after-school programs
 - Summer school programs
 - Family literacy programs for families of participating students or students receiving Title services
 - Counseling and/or mentoring programs
 - Computer-assisted instruction (i-Ready, Lexia, Khan Academy, etc.)
 - Home tutoring
 - Instruction using take-home computers
 - Equipment and instructional materials and supplies to assist with services (computers, calculators, workbooks, etc.)
 - Professional development for teachers with Title I students (very beneficial if no Title II services are available)
 - Any combination of the above
- Any equipment, materials, or supplies purchased must be reserved only for the use of the Title I teacher to serve those students receiving Title I services.
- Title I services may only be provided to the grades that are being served at the Title I public school.
- An LEA can not simply provide a private school with ONLY instructional materials and supplies. Services should be equitable to public schools.



Parent and Family Engagement Activities

If an LEA's Title I allocation is **less than \$500,000, they are not required** to use a portion of the proportional share for equitable services for parent and family engagement. During consultation with private school officials, though, an agreement can be made to still reserve a portion of that proportional share for those services. The amount would be determined during consultation.

If an LEA's Title I allocation **exceeds \$500,000, at least 1% must be reserved** and spent on parent and family engagement activities. This requirement would also apply to the proportional share for equitable services to ensure that parents and families of private school children participate, on an equitable basis, in such services and activities.

Examples of parent and family engagement activities for families of identified students include: parent meetings, parent-teacher conferences, communication between the Title I teachers and parents on students' academic progress, parent education, parent training activities on how to work at home with children on content and skills, reasonable access to Title I staff to receive information about their child's progress, and private school parent representation on a district-wide private school working group. Light refreshments may be included, as appropriate, in order to facilitate attendance at these activities.

Title I, Part C (Migrant) Services

- Instructional services for migratory children
 - Include activities for preschool-age migratory children
 - Supplemental instruction in ELA and Math for elementary and secondary students
 - Summer programs.
- Support services for migratory children
 - Including but not limited to translation and interpretation for Migrant families
 - Access to health and social service providers
 - School supplies
 - Family engagement activities.



Title II Services

- All activities, including conferences, should be preapproved.
 - The costs must be reasonable, necessary, and tied to the private school's professional development plan that is based on their needs assessment.
- Funds may be used to provide professional development activities for teachers, principals, and other school leaders, as well as materials to support professional development.
- Any other use of these funds for the benefit of private school participants must be an allowable local use of Title II, Part A funds.
- An LEA can invite private school teachers and leaders to participate in professional development that the public school is attending or hosting.
 - If the private school's needs are different from the public school's, the LEA can work with private school officials for staff to attend separate professional development opportunities.
- Funds may NOT be used for class size reduction.
- Before making the decision to transfer Title II funds, LEAs MUST consult with private schools.



Title III Services

- The costs must be reasonable, necessary, and tied to the private school's Language Instruction Educational Program plan that is based on their needs assessment.
- Tutoring for ELs before, during, or after school hours.
- Professional development for private school teachers of ELs.
- Summer school programs to provide English language instruction for ELs.
- Administration of an ELP assessment for identification of ELs and/or for the purpose of evaluating the effectiveness of services, including the provision of test booklets, teacher training, and stipends to teachers to administer assessments
 - Caviat: this is allowable if the LEA and the Private school agree during consultation and the use of such funds would not supplant other Federal, State, or local funds that may be used for such purposes, and where the assessment would be supplemental to the level of services that the private school children would receive in the absence of the Title III.
- Family literacy services and parent and family outreach and training activities to support the education of ELs in private schools; and
- Supplemental EL instructional materials and supplies.





Title IV, Part A Services



- Title IV, Part A services for equitable services follow the same three content areas for student support and academic enrichment, as follows:
 - Well-Rounded Education: Provide enriched curriculum and educational experiences to all students.
 - Safe and Healthy Students: Improve conditions for student learning.
 - Effective Use of Technology: Improve the use of technology in order to improve the academic achievement and digital literacy of all students.
- LEAs MUST consult with private schools before making the decision to transfer Title IV-A funds.
- Examples of use of funds for Title IV, Part A include, but are not limited to:
 - Instruction in music, art, and language programs
 - Robotics and engineering programs
 - STEM competitions
 - 3D printer, along with the curriculum to use it
 - Field trips and museum programs tied to instruction
 - Counseling and mental health services
 - Character education learning programs
 - Training and professional development for teachers in any of the content areas
 - Student health/PE equipment
 - Speakers on safety and healthy, drug-free environments

The Title IV 20/20/15 percentages do not apply to equitable services, only to the LEAs' total allocation.





Title IV, Part B (21ST CCLC) Services

- 21st CCLC programs provide academic enrichment during non-school hours for children, particularly students who attend high-poverty and low-performing schools. The program helps students meet state and local student standards in core academic subjects, such as reading and math; offers students a broad array of enrichment activities that can complement their regular academic programs; and offers literacy and other educational services to the families of participating children.
- 21st CCLC programs must document consultation with private school officials during the design and development of the 21st CCLC program and yearly on subjects such as how the student's needs will be identified and priority must be given to students at risk of academic failure, including English language learners, students in special education and students with social and emotional needs.
- Private school students and their families, residing in the attendance area of the targeted school, are eligible to participate in 21st CCLC programs.



How to Maximize a Small Budget

- Many LEAs in the rural areas of Arkansas struggle with working with a very small budget for equitable services. Remember, an LEA can't just provide a private school with instructional materials and supplies using Title I funds. Below are some options when working with a small budget:
 - **Provide Title I Services Other Than Direct Instruction.** Other services include counseling, professional development activities for staff to improve instruction, and parent engagement activities. The services must still be assessed, though, to measure academic achievement.
 - **Coordinate Funds with Other Title Programs.** Use Title I funds to provide instructional services to eligible Title I private school students, use Title II funds to provide professional development to the teachers of those students, Title III for English learners among those students, and Title IV to provide counseling services to the most at-risk students. The funds must still be used for allowable activities under each program.
 - **Pooling Funds Within an LEA or Across LEAs.** Each private school involved must agree to pooling. This can not be a decision solely made by the LEA.

During consultation, a decision could also be made where the private school takes ownership of overseeing an online subscription purchased with Title I funds to be used by eligible students.

Direct instruction could still be provided, but the time in which the students receive the instruction might be limited to once a week or once a month in order to be covered by the funds available.

Equitable Services Carryover

- Every effort should be made to provide equitable services in the fiscal year for which the funds were appropriated in order to ensure services are being offered in a timely manner.
- An LEA may continue to obligate funds generated for equitable services for the previous school year during the summer after the school year ends and at the start of the next school year, as long as the obligations occur by September 30, the end of the federal fiscal year.
- However, if extenuating circumstances arise and an LEA is unable to obligate all funds within this timeframe, the LEA must carryover those funds and use them for equitable services in the affected private school the following year.
- A redistribution of Equitable Services carryover is only possible if, during the consultation, ***the private school official notified the LEA in writing*** that no further services are needed or if they decline services that would have been provided with those unobligated funds.
- The 15% carryover limitation under Title I does not apply to Equitable Services since LEA generally must carry over any equitable services funds not obligated by the private school. If an LEA exceeds the carryover limitation, the reduction may not come from the portion of carryover funds used to provide equitable services.



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Federal Grants Management & Indistar

Affirmation of Consultation with Private Schools Form

- ● May 1st of each year is the deadline for the Consultation Form to be uploaded into **Indistar** in the correct Form Upload folder.
 - May 1, 2024 is the deadline for the SY 24-25 Consultation Form that will go in the 24-25 Form Upload folder.
 - This document is usually the first document to be uploaded into the folder each year. The folder will not appear in the list of folders in the “Document Upload” page until at least one document is placed into that folder.
 - Go to the Document Upload page
 - Click “Upload a New File”
 - Select the next year’s Form Uploads folder from the “Select Folder” dropdown menu
- The Private School Data collected on the consultation form for SY 24-25 will be the most current Private School Data collected during prior SY.
- The data provided in the consultation should match what will be entered in the Federal Grants Management System.

Preliminary Budget

- Preliminary Title allocations are posted around August 1, 2024.
- Once posted, **Federal Grants Management (FGM)** will be open for submission for 30 days (usually in September).
- The data provided to ADE on the affirmation of consultation on May 1, 2024, should match what will be entered into the Federal Grants Management System to calculate the SY 24-25 Equitable Services preliminary allocations.

Remember to update the Equitable Services data in FGM to match the affirmation of consultation form (sent to ADE on May 1, 2024).

To make these changes, click on “Alter Prerequisites” and follow the next steps.

- If no equitable services were offered the previous year, the allocation amount will not pre-generate, showing zero. The LEA will need to use the calculation formulas to determine equitable services allocations.

Remember to provide equitable services funding figures to participating private school officials.

How to Update Equitable Services Data in FGM

2018 Budget Year - Final budgets will be accepted by ADE until 2/2/2018

Preliminary Budget: N/A

Final Budget: N/A

Transfers

Prerequisites

You must complete your district's Building Configuration and ESSA Private School Enrollment prior to completing your budget. Once these steps are complete, you may complete your budget.

Note: after the Building Configuration and Private School Enrollment have been finalized, any changes to these areas will invalidate budget versions that you have created up to that point.

Building Configuration

ESSA Private School Enrollment

- LEAs will click on the button labeled ESSA Private School Enrollment under Prerequisites to enter current low-income private school numbers.
- Data from the Affirmation of Consultation form was sent to ADE on May 1, 2024, for SY 24-25 allocations.**
- Even if the LEA does not have any private school students, they will still click here.

How to Change Equitable Services Data in FGM

ESSA Private School Enrollment






Please record your district's Private School enrollment for the 2018 school year below. NOTE: These enrollment amounts will be used for the following purposes:

- Determining the Proportionate Share for Private Schools according to ESSA Regulations next (e.g. 2019) school year.
- Determining the funds to allocate this year for each building's Equitable Share of this year's Equitable Services Set Aside. This will be calculated during the Title I - Rank & Serve step.

LEA	School Name	Grade Span	Total Private School Enrollment	Low Income Private School Enrollment	
2303016	GREENBRIER EASTSIDE ELEMENTARY	K-5	0	0	+
2303017	GREENBRIER HIGH SCHOOL	10-12	0	0	+
2303018	GREENBRIER MIDDLE SCHOOL	6-7	0	0	+
2303019	GREENBRIER WESTSIDE ELEMENTARY	K-5	0	0	+
2303020	GREENBRIER JUNIOR HIGH SCHOOL	8-9	0	0	+
2303021	GREENBRIER WOOSTER ELEMENTARY	K-5	0	0	+
2303023	GREENBRIER SPRINGHILL ELEMENTARY SCHOOL	K-5	0	0	+
Totals			0	0	








- Click the blue “+” sign to enter the number of low income private school students for each school building.
- **Data from the Affirmation of Consultation form was sent to ADE on May 1, 2024, for SY 24-25 allocations.**
- If the LEA has no private school students to enter, click the green check mark.

How to Change Equitable Services Data in FGM

 **ESSA Private School Enrollment**  

Please record your district's Private School enrollment for the 2018 school year below. NOTE: These enrollment amounts will be used for the following purposes:

- Determining the Proportionate Share for Private Schools according to ESSA Regulations next (e.g. 2019) school year.
- Determining the funds to allocate this year for each building's Equitable Share of this year's Equitable Services Set Aside. This will be calculated during the **Title I - Rank & Serve** step.

LEA	School Name	Grade Span	Low Income Private School Enrollment	
1002006	CENTRAL PRIMARY SCHOOL	2-3	0	
				 
	Private School Name is required.			
1002007	LOUISA PERRITT PRIMARY	K-1	0	
1002008	PEAKE ELEMENTARY SCHOOL	4-5	0	
1002009	GOZA MIDDLE SCHOOL	6-8	0	
1002010	ARKADELPHIA HIGH SCHOOL	9-12	0	
Totals			0	

- If LEA has more than one private school per building, click on the blue "+" button to add more lines.
- Once all data has been entered, click on the green check.

Final Budget

- FGM will open for final budget submission in **February** after final allocations have been determined.
- The deadline for final budget submission is **April 1st** or the Monday after the 1st if it falls on a weekend day.
- The data provided to ADE on the affirmation of consultation on May 1, 2024, should match what it is in the Federal Grants Management System to calculate the SY 24-25 Equitable Services final allocations.

Remember to provide equitable services funding figures to participating private school officials.



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Resources

Helpful Websites

- [Federal Programs Private Schools website](#) - Here you will find a copy of:
 - Affirmation of Consultation with Private Schools Form
 - Affirmation of Consultation Information Sheet
 - Equitable Services FAQs document
 - List of Known Arkansas Private Schools by County
 - Sample Title I Non-Public Family Income Survey
- [Arkansas Public Schools and Districts Boundaries Map](#)
- [Title I Equitable Services Non-Regulatory Guidance](#)
- [Title VIII Equitable Services Non-Regulatory Guidance](#)
- [Within-District Allocations Under Title I, Part A Non-Regulatory Guidance](#)



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Complaints



Equitable Services Complaints

- If a positive relationship has been developed between the LEA and the private school official, concerns and complaints that arise can be discussed with more ease and solutions reached.
- The private school official should first address any concerns and complaints with the LEA in an attempt to solve any problems.
- If the problem cannot be resolved, the private school official has a right to file a complaint with the SEA.
- A complaint can also be filed if the private school official believes the LEA has not engaged in consultation was not meaningful and timely, has not given due consideration to the views of the private school official, or has not made a decision that treats the private school students equitably.
- Complaints go the Equitable Services Ombudsman, April Jarvis.
- Refer to the Equitable Services Ombudsman website for the complaint, resolution, and appeals process, as well as to access a complaint form: <https://dese.ade.arkansas.gov/Offices/Office-of-Special-Education-and-Federal-Program/federal-programs/federal-programs-ombudsman-equitable-services>



For additional information, please contact:

Elizabeth Gomez

Title I, V & VIII Program Director & Ombudsman

Phone: 501-682-5295

Email: Elizabeth.Gomez@ade.arkansas.gov

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