



GADOE Equitable Services Update (Part 1 – Cares Act) May 6, 2020 Webinar Q&A Follow-Up

Applicability	
Do non-LEAs (like some 21 st CLCC recipients) and Charter Schools that are LEAs need to provide equitable services under the CARES Act?	No. Only the traditional 180 county and city school districts in Georgia are required to provide equitable services.
If there are no private schools in our geographic boundaries, then is there anything that we need to do?	No.
Eligibility	
If a private school needs to update enrollment information, where can the DE1111 form be located?	The DE1111 form is available on the GaDOE Data Collections webpage (PDF) and on the right side of the GaDOE State Ombudsman webpage (PDF and Word).
How should an LEA proceed if a private school in the geographic boundary is not nonprofit?	The LEA should verify profit/nonprofit status using the Secretary of State business search or by reaching out to the school. The status listed on the GaDOE webpage defaults to profit and any updates are LEA reported. Remember that some private schools are registered under the auspices of another business. If the LEA knows decisively that the school is for profit, an invitation need not be extended.
If a private school outside the state serves Georgia students, is an LEA required to reach out to them?	No. Only private schools physically located within the geographic boundaries of a school district are eligible.
Is it possible to have a private school in an LEA's geographic boundaries that does not serve students from the LEA?	Yes. While not common in Georgia, it is possible that a private school in the geographic boundaries serves students who do not reside in the LEA. By serving both public and nonpublic students where they attend school, there should not be duplication in services.
If a private school's nonprofit status is listed as active/noncompliance on the Secretary of State Website, are they eligible to participate?	Yes. They are eligible. There is a probationary period where they haven't submitted their fees and/or annual report, but the state hasn't revoked their nonprofit status.



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<p>Does an LEA need to reference the Secretary of State Business Search if the GaDOE site lists the school as For Profit?</p>	<p>Yes. Nonprofit status is updated annually on the Secretary of State Website. GaDOE’s status defaults to For Profit unless a LEA reports otherwise. GaDOE strongly encourages LEAs to verify before inviting.</p>
<p>Is religious affiliation a factor in determining eligibility?</p>	<p>While Equitable Services must be secular, neutral and non-ideological in nature, religious affiliation is not an eligibility factor. Criteria for eligibility include:</p> <ul style="list-style-type: none"> • Elementary and/or secondary k-12 private school • Private School in accordance with state laws • Nonprofit • In existence prior to enactment of CARES Act funds
<p>If a private school did not submit attendance information to any point of contact in the school district for 2019-2020, is the school now eligible for CARES Act funding?</p>	<p>Private School Officials are responsible for complying with state law. This requirement is not new. The State Ombudsman emailed a reminder to all contacts listed on the GaDOE Private School list on August 30, 2019. The GaDOE advises LEA’s that while the DE1111 Form is preferred, the submission of attendance information on any form meets the intent of the law as long as attendance was reported in the current year.</p>
<p>If a private school is located in two counties, who should provide services?</p>	<p>Determine which LEA boundaries contain the physical address that the private school uses for official legal purposes like taxes and nonprofit registration.</p>
<p>If the private school is not on the GaDOE Private School list, but reported numbers to the local LEA in 2019-2020, can they participate?</p>	<p>Yes.</p>
<p>If the private school is not accredited at this time, but will be this Fall, do we still need to hold a consultation?</p>	<p>Private school accreditation is not a requirement under Georgia law.</p>
<p>Invitations</p>	



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<p>Which private schools did GaDOE contact about the CARES Act on Monday, May 4, 2020?</p>	<p>All private schools listed on GaDOE’s Private School List informed by annual LEA DE1111 reporting and any private schools that have reached out directly to GaDOE. Any returned emails were researched and sent to an alternative contact when present. If not, any contact forms were filled out with applicable information.</p>
<p>Can LEAs get a copy of the email sent to private schools to help craft communication?</p>	<p>A PDF of the original email can be accessed on the State Ombudsman webpage on the GaDOE website.</p>
<p>Will LEAs also send invitations if the state already reached out?</p>	<p>Yes. Often LEAs have a different point of contact. GaDOE emailed DE1111 contacts; however, GaDOE has asked LEAs to make a good faith effort to reach out using multiple methods such as email, phone, web posting, social media, etc.</p>
<p>Should an interested private school go ahead and reach out? If yes, to which school districts should they reach out? Who is the point of contact in school districts?</p>	<p>Private schools are welcome to proactively connect with school districts. They need only reach out to the ONE County or City school district in whose geographic boundaries the private school is located. Student residence is not a factor in equitable services. GaDOE will be using Title I Federal Programs Directors as the primary point of contact until notified otherwise. If a private school has trouble reaching staff, please contact ombudsman@doe.k12.ga.us and GaDOE staff will assist.</p>
<p>Who should I contact If the GaDOE list reflects a school district that is not correct?</p>	<p>The GaDOE private school list reflects data reported annually by LEAs. LEAs have the ability to update contact information year-round. Please reach out to GaDOE Data Collections staff if you need assistance and copy the State Ombudsman at ombudsman@doe.k12.ga.us.</p>
<p>Should LEAs share the GaDOE Intent to Participate link if they mail a letter?</p>	<p>Yes.</p>
<p>Intent to Participate</p>	<p>DUE MAY 20, 2020</p>



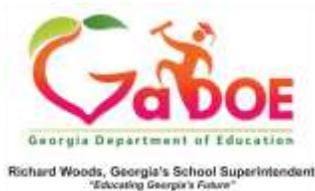
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Who completes the Intent to Participate form hosted by GaDOE?	The form is intended for private schools. LEAs are asked to use this link when they reach out to private schools
Can the ES4PS online platform be used for Invitations?	While the ES4PS can be used for invitations, its primary purpose is ESSA. Invitations should have been sent by now for FY21. Further, ES4PS cannot be used for Intent to Participate or Affirmation of Consultation for the CARES Act.
What reason would a private school have for not wanting to participate?	If a private school has not seen a disruption in services due to COVID-19 and has sufficient resources to address health and continuous access to learning, the private school might decline participation.
If private schools indicate to GaDOE that they do not wish to participate, the LEAs do not need to invite/consult, right?	Correct.
Who at the school district will GaDOE contact if it hears that a private school in an LEA wants to participate?	We will start by contacting the Title I Director.
Is the LEA copied on the Intent to Participate form that is submitted by private school?	No, but the results will be communicated daily.
Determining Proportionate Share	
What will school district's use to determine the private school enrollment for March 5, 2020?	Private schools do not participate in Georgia's required count taken on March 5 th . Therefore, the private school should provide the LEA reasonable documentation of their enrollment as of March 5 th . The count should be listed on the "Intent to Participate" form and will be shared by GaDOE with LEA points of contact.
Does enrollment include pre-K students or only K-12? Do we include teachers in that number?	Only K-12 enrollment should be included, though Pre-K students are eligible to benefit from funds reserved in the private school's proportionate share. Teachers are not included in that number.
Consultation	



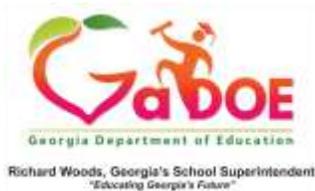
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<p>Is there a uniform needs assessment form?</p>	<p>GaDOE will collect needs relative to CARES Act use of funds and will communicate this with LEAs.</p> <p>Specific needs for private schools will be discussed in consultation.</p>
<p>Does a June 30, 2020 Consultation Submission Deadline mean that private schools will not have access or invitations until that time?</p>	<p>No. We encourage LEAs and private schools to prioritize CARES Act funds. GaDOE anticipates that invitations will start 05.06.2020 and consultation will start shortly following the receipt of the private school’s intent to participate. The use of the June 30, 2020 deadline is to streamline administrative submissions for both CARES Act and ESSA Equitable Services to the same date. Services may start as soon as consultation has started and the LEA’s budget is approved.</p>
<p>Are private schools required to consult with the LEA?</p>	<p>Yes. Consultation is required by both law and guidance. Because the LEA retains control of the funds, consultation will be critical for determining how equitable services will be provided. Consultation may be conducted remotely by phone, email, and virtual conferencing, etc.</p>
<p>Affirmation of Consultation</p>	<p>DUE JUNE 30, 2020</p>
<p>Is the GaDOE Adobe form only for private schools that would like to participate? Or, does it need to be completed by all private schools?</p>	<p>The GaDOE Affirmation of Consultation need only be completed by LEAs and participating private schools and then submitted by LEAs to GaDOE through the JotForm submission link. The form and submission link can be accessed on the State Ombudsman webpage on the GaDOE website.</p>
<p>Regarding the Jotform for Affirmation and Initial Consultation that is due June 30, would a district upload 1 form for each school that chooses to participate?</p>	<p>Forms may be loaded individually or in one combined document.</p>
<p>Budgeting</p>	



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How soon will funds be available?	Funds will be available upon GaDOE approval of LEA budgets, which may be submitted as early as funds are available in the MyGaDOE Consolidated Application.
Will the private school receive the funds directly?	No. Funds must remain in control of the LEA.
Will the funds transition through the GaDOE like other grants?	Yes. GaDOE has a series of FAQs to address logistics for LEAs.
Reasonable amount for administrative fees is open to interpretation. Is there a precise percentage advised?	USDE advises reasonable and necessary to the administration of the CARES Act. This will vary LEA to LEA. Some states are recommending LEAs use 2%-10% in alignment with ESSA administrative CAPS.
Can indirect cost be applied to this grant?	Yes.
Provision of Equitable Services	
Can materials agreed upon in consultation and purchased by the LEA be shipped directly to a private school?	In most cases, yes, materials could be sent directly to the private school. However, if materials include devices that have to be added to the LEAs inventory (such as laptops, Chromebooks, iPads, hotspots, etc.) the LEA may need to work with private schools to make alternative arrangements.
Can funds be used for tuition assistance? If so, can you provide additional information?	Funds may be used for any activity allowable under ESSA, IDEA, Perkins, McKinney-Vento and the Adult Education and Family Literacy Act in addition to any of the allowable uses under the CARES Act.
Will ALL students in the participating private schools be eligible for funds rather than only at-risk students?	Yes. USDE's FAQs clarify that the intent of the CARES Act is to support all public and nonpublic students and teachers without regard to residence, achievement or poverty.
Can CARES Act funds be used for equitable services to support the 21st CCLC program?	Yes. Funds may be used for any activity allowable under ESSA, IDEA, Perkins, McKinney-Vento and the Adult Education and Family Literacy Act in addition to any of the allowable uses under the CARES Act.



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If funds are used for salaries, public or private, must periodic certification be kept for these employees?	Yes.
Is there a minimum number of work hours required of contractors (SLP, OT) in order to earn compensation?	No.
Would an LEA need to develop a plan for a participating private school in the same way we would for a school participating with Title I?	Plans for CARES Act funds should be discussed in consultation and may be best captured through a plan that prioritizes private school needs and equitable services agreed upon in consultation.
Do all products/services purchased with these funds have to remain in the ownership of the LEA?	Yes.
CARES Act Waivers	
Did the CARES Act extend any waivers that impact Title II, Part A?	Yes. Given the need to provide short term training to teachers and school administrators around COVID-19 related topics, including virtual learning, the ESSA definition for “professional development” has been waived for the remainder of FY20.
For which ESSA Title programs were carryover limitations removed?	Title I and 21 st CLCC. No other program has a statutory carryover limitation.
Other	
Do LEAs need to notify the State Ombudsman of carryover for private schools from FY20 or will those funds stay with the private school through Sept. 30, 2021?	While the GaDOE is anticipating approval of all remaining FY20 funds to be used as carryover in FY21 due to extenuating circumstances, a form for approval must still be submitted for tracking purposes and will be addressed in the webinar 05.11.2020.
Will the CARES Act be included in monitoring if the LEA is up for monitoring in FY21?	We are awaiting further guidance from USDE.