

# May 2019 GaDOE Equitable Services Updates & Training

Thursday, May 16, 2019  
9:00 AM - 10:00 AM

# Welcome

- To provide updates and relevant training on the provision of equitable services under the Every Student Succeeds Act.
- This webinar is appropriate for private school recipients of equitable services and district providers of equitable services.
- This webinar will be recorded for any interested personnel who are unable to make the live online session.



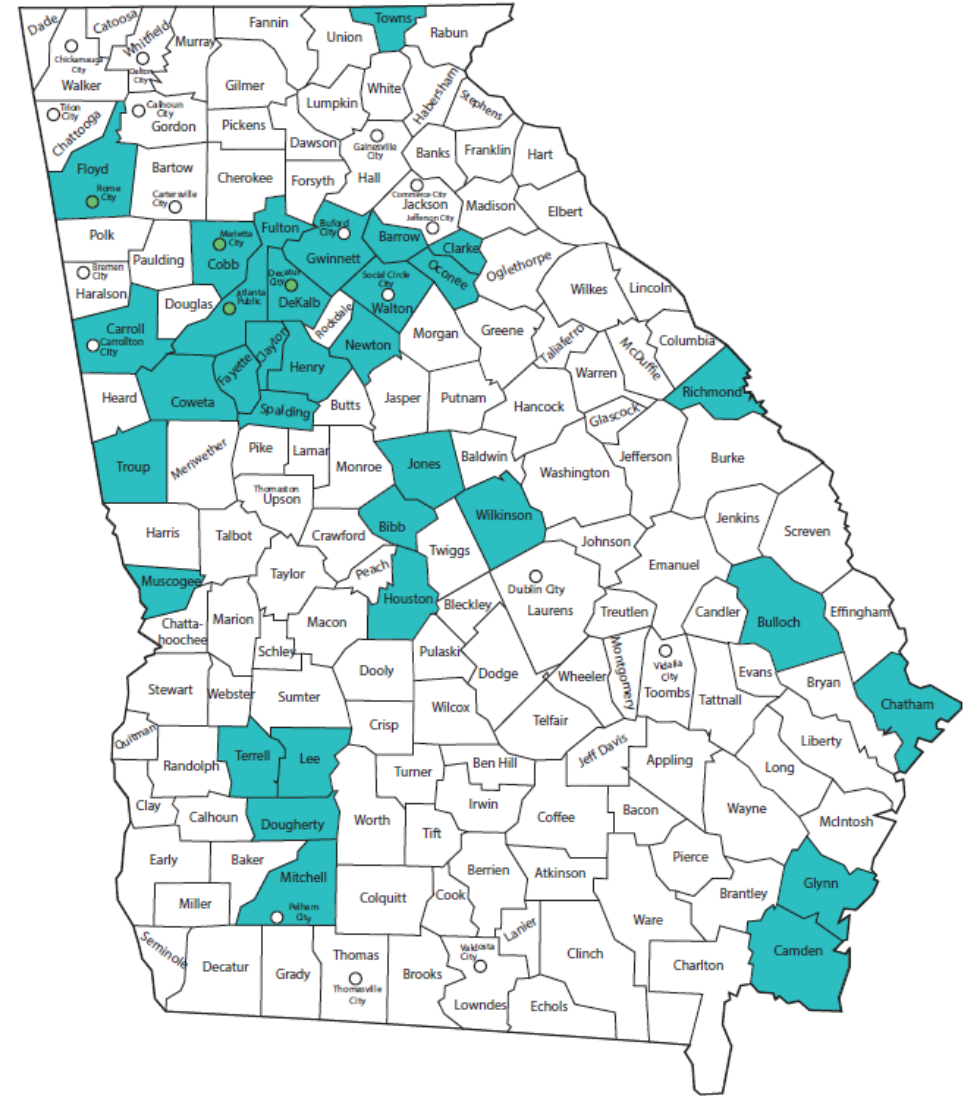
# Presenters & Points of Contact

<b>OMBUDSMAN</b>	<b>FOR GENERAL INQUIRIES REGARDING EQUITABLE SERVICES IN GEORGIA</b>	<b>OMBUDSMAN@DOE.K12.GA.US</b>
Shaun Owen	Deputy Chief of Staff Director of Consolidated Federal Initiatives, State Ombudsman	<a href="mailto:sowen@doe.k12.ga.us">sowen@doe.k12.ga.us</a>
Carly Covic Ambler	Federal Programs Senior Manager	<a href="mailto:cambler@doe.k12.ga.us">cambler@doe.k12.ga.us</a>
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Deidre Smith	Program Manager, Title IV, Part B, 21 <sup>st</sup> Century Community Learning Centers	<a href="mailto:desmith@doe.k12.ga.us">desmith@doe.k12.ga.us</a>

# Equitable Services

Equitable Services are services provided under Title I and Title VIII of the Every Student Succeeds Act to eligible private school students, teachers, leaders and parents that are equitable to services provided to students, teachers, leaders and parents in public schools.

IN 2018-2019 6 ESSA PROGRAMS ALLOCATED FUNDS TO PRIVATE SCHOOLS IN 36 DISTRICTS.



# Agenda

- Updates to Guidance
- Updates to Resources
- Hot Topics
  - Transferability
  - Carryover
  - Administration
- Question and Answer



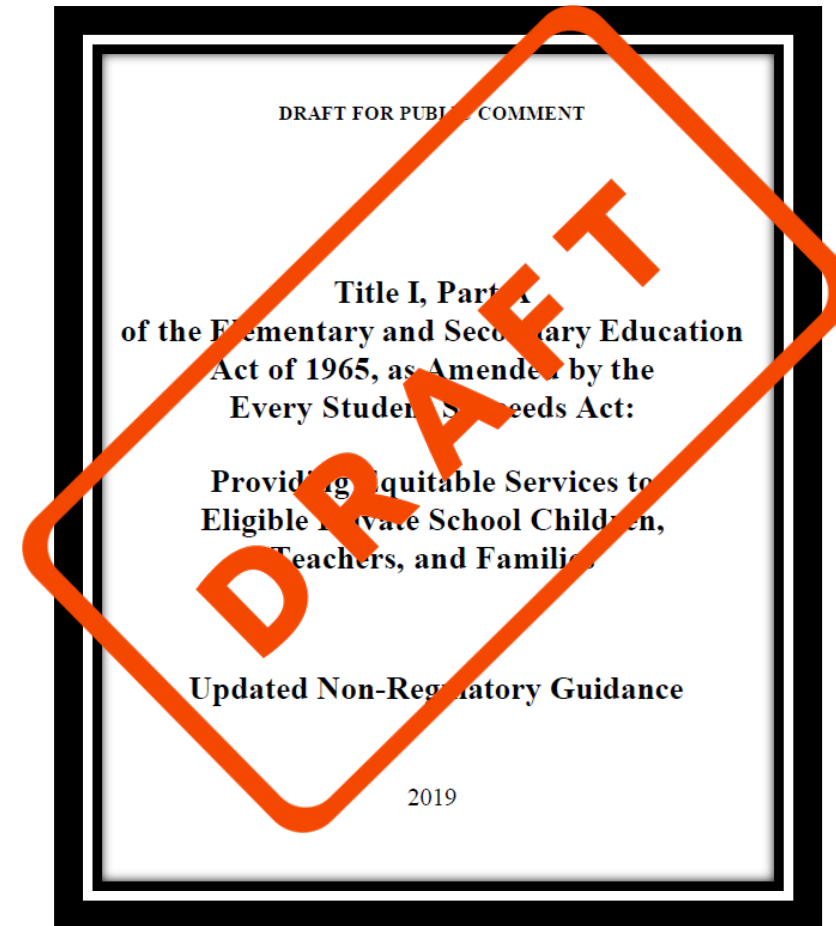


# Updates to Guidance

# USDE DRAFT Non-Regulatory Guidance, 2019

DRAFT Title I Equitable Services Guidance  
Supersedes:

- Title I Services to Eligible Private School Children, Non-Regulatory Guidance (October 17, 2003)
- Ensuring Equitable Services to Private School Children: A Title I Resource Tool Kit (September 2006)
- Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements under the Elementary and Secondary Education Act of 1965 (ESEA), as Amended by the Every Student Succeeds Act (ESSA) (November 21, 2016).





# USDE Crosswalk to New Guidance

## Contributing Guidance

- 2003 Guidance – Informed 57 Q's
- 2006 Guidance – Informed 0 Q's
- 2009 Guidance – Informed 4 Q's
- 2015 Guidance – Informed 4 Q's
- 2016 Guidance – Informed 19 Q's
- NEW Guidance – 22 New Q's

*Crosswalk Between Draft Title I, Part A of the Elementary and Secondary Act of 1965, as Amended by the Every Student Succeeds Act: Providing Equitable Services to Eligible Children, Teachers, and Families, Non-Regulatory Guidance and Prior Non-Regulatory Guidance*

Question from Draft Guidance	Relevant Prior Guidance <sup>1</sup> (Document Title and Question Number)
A-1. What is consultation?	<i>Title I Services to Eligible Private School Children, Non-Regulatory Guidance (October 2003)</i> (available at <a href="http://www2.ed.gov/programs/titleiparta/psguidance.doc">http://www2.ed.gov/programs/titleiparta/psguidance.doc</a> ) Reference: A-1
A-2. Who is responsible for initiating consultation and how should it begin?	<i>Title I Services to Eligible Private School Children, Non-Regulatory Guidance (October 2003)</i> Reference: A-2
A-3. What is an "Intent to Participate" form?	<i>Title IX, Part Uniform Provisions, Subpart 1, Private Schools, Equitable Services for Eligible Private School Students, Teachers, and Other Educational Personnel, Non-Regulatory Guidance (Rev. March 2009)</i> (available at <a href="https://www2.ed.gov/policy/elsec/guid/equitableseguidance.doc">https://www2.ed.gov/policy/elsec/guid/equitableseguidance.doc</a> ) Reference: D-13
A-4. May an LEA set a deadline for private school officials to indicate their intent to participate?	<i>Title IX, Part Uniform Provisions, Subpart 1, Private Schools, Equitable Services for Eligible Private School Students, Teachers, and Other Educational Personnel, Non-Regulatory Guidance (Rev. March 2009)</i> Reference: D-23
A-5. How does an LEA determine which private schools to contact?	<i>Title IX, Part Uniform Provisions, Subpart 1, Private Schools, Equitable Services for Eligible Private School Students, Teachers, and Other Educational Personnel, Non-Regulatory Guidance (Rev. March 2009)</i> Reference: D-2



# Nonprofit Status

- **Objective:** To verify the nonprofit status of participating private schools
- **When to Verify:** Annually, during consultation
- **Who is Responsible:** LEAs & Participating Private Schools
- **What Documentation is Required:**
  - Private School is Nonprofit: Screenshot, printout, confirmation or receipt from Secretary of State in current year verifying nonprofit status of the private school
  - Private School is Subordinate to Another Organization that is a Nonprofit:
    - Foundational Documentation verifying private school is subordinate to a primary organization, including the legal business name of the primary organization
    - Screenshot, printout, confirmation or receipt from Secretary of State in current year verifying nonprofit status of the primary organization
- **Where to File Documentation:** Documentation should be kept on file at the LEA and is subject to GaDOE monitoring



## ESSA Equitable Services Verifying and Documenting Private School Nonprofit Status

Private schools must demonstrate nonprofit status in order to participate in equitable services under Title IA and Title VIII (IC, IIA, IIIA, IVA, IVB)

The Every Student Succeeds Act of 2015 (ESSA), like the earlier No Child Left Behind Act of 2001 (NCLB), requires LEAs to ensure that private schools that participate in equitable services have active nonprofit status.

Nonprofit, as defined by 34 Code of Federal Regulations (CFR) Part 77.1, means an "agency, organization, or institution, that is owned and operated by one or more corporations or associations whose net earnings do not benefit, and cannot lawfully benefit, any private shareholder or entity."

It is important to note that nonprofit does not mean tax-exempt. While all tax-exempt entities are nonprofits, not all nonprofits are tax-exempt. Tax-exempt status is granted by the IRS and nonprofit status is granted by states.

Georgia's students attend private schools in and out-of-state which means that the documentation available for verifying nonprofit status may vary depending on the state.


### How to Verify Nonprofit Status

In Georgia, private school nonprofit status must be verified annually. Annual verification is available on Secretary of State websites. In order to look up the status of a private school, LEAs will need the legal business name of the school and/or legal business name of the primary business under which the school falls.

If the school is registered/covered under another business, the school must provide foundational documentation to verify the relationship between the school and other organization and will require the legal business name of the umbrella business to verify nonprofit status.

STATE	DEADLINE FOR RENEWAL	BUSINESS SEARCH	NONPROFIT STATUS
GEORGIA	APRIL	<a href="https://ecorp.sos.ga.gov/BusinessSearch">https://ecorp.sos.ga.gov/BusinessSearch</a>	ACTIVE COMPLIANT
ALABAMA	APRIL/SEPTEMBER	<a href="http://arc-sos.state.al.us/CGI/CORPNAME.MBR/INPUT">http://arc-sos.state.al.us/CGI/CORPNAME.MBR/INPUT</a>	EXISTS
FLORIDA	SEPTEMBER	<a href="http://search.sunbiz.org/inquiry/CorporationSearch/ByName">http://search.sunbiz.org/inquiry/CorporationSearch/ByName</a>	ACTIVE
NORTH CAROLINA	ROLLING DEADLINE	<a href="https://www.sosnc.gov/search/index/corp">https://www.sosnc.gov/search/index/corp</a>	CURRENT ACTIVE
SOUTH CAROLINA	MAY	<a href="https://businessfilings.sc.gov/BusinessFiling/Entity/Search">https://businessfilings.sc.gov/BusinessFiling/Entity/Search</a>	GOOD STANDING
TENNESSEE	SEPTEMBER	<a href="https://tnbear.tn.gov/ecommerce/default.aspx">https://tnbear.tn.gov/ecommerce/default.aspx</a>	ACTIVE





GEORGIA  
CORPORATIONS DIVISION

BUSINESS SEARCH

SERVICE OF PROCESS SEARCH

☐ Starts With
 ☒ Contains
 ☐ Exact Match

☒ Business Name:

*Note: Enter a business name to lookup (This can be partial or full name)*

☐ Control Number:

☐ Registered Agent Name:

☐ Officer Name:



BUSINESS SEARCH RESULTS					HOME
Business Name	Control Number	Entity Type	Principal Office Address	Registered / Designated Agent Name	Status
THE FRIENDS SCHOOL OF ATLANTA, INC.	K011848	Domestic Nonprofit Corporation	862 COLUMBIA DR, DECATUR, GA, 30030, USA	WAMAN FRENCH	Active/Compliance
Page 1 of 1, records 1 to 1 of 1					

# Business Entity Records

[Home](#) > [Government Records](#) > Business Entity Records

## Government Records Inquiry System

Welcome to the Secretary of State's Government Records Inquiry System. This facility provides you easy access to public information maintained by the Secretary of State's office in electronic format. If you are searching for certain corporation records from 1949-2010, please visit <https://www.archives.alabama.gov>.

## Business Entity Search Options

[Entity Name](#)  
[Entity Number](#)  
[Officer / Agent / Incorporator](#)  
[Month and Year](#)  
[Date](#)  
[Reservation / Registration by ID](#)

Each search option opens in a new browser window. Close the window to return to this page.

Should you encounter problems or have questions about using this facility, please e-mail the [Webmaster](#).

### Business Entity Search By Entity Name

Please use the options below to search our business entity records.  
Filings completed through 05-13-2019

Name:	<input type="text"/>
Type:	<input type="text" value="All Records"/>
Place of Formation:	<input type="text" value="All Records"/>
Principal City:	<input type="text"/>
Status:	<input type="text" value="All Records"/>
<input type="button" value="Search"/>	

## Government Records

Code of Alabama  
Constitution (1901)  
Proposed Constitutional  
Amendments  
Legislative Acts  
Administrative Code

• Proposed Rules

Records Disposition  
Authority  
Campaign Finance Records  
Notary Public Records  
Civil Law Notary Records  
**Business Entity Records**  
UCC Records

Alabama

Entity ID	Entity Name	City	Type	Status
<a href="#">555 - 003</a>	<a href="#">Abbeville Christian Academy Endowment Foundation</a>	ABBEVILLE, AL	Domestic Non-Profit Corporation	Exists
1				
<input type="button" value="New Search"/>				



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) /

### Search for Corporations, Limited Liability Companies, Limited Partnerships, and Trademarks by Name

Entity Name:

#### Other Search Options

Search by:

- Entity Name
- [Officer/Registered Agent](#)
- [Registered Agent Name](#)
- [Trademark Name](#)
- [Trademark Owner Name](#)
- [FEI/EIN](#)
- [Detail By Document Number](#)
- [Zip Code](#)
- [Street Address](#)

Need more help? Review our [Corporation Record](#)



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search By Entity Name](#) /


[Next List](#)

Entity Name Search

#### Entity Name List

Corporate Name	Document Number	Status
<a href="#">ROBERT F. MUNROE DAY SCHOOL, INC.</a>	716488	Active
<a href="#">ROBERT F. NAGEL, P.A.</a>	698233	INACT
<a href="#">ROBERT F. NOVA &amp; COMPANY</a>	P93000044177	INACT





Secretary of State  
Elaine F. Marshall

HomeI Want To...Divisions

# Search

Search By:

Company

Words

Starting With

Search For:

Carolina Christian Academy


Search →

## Search Results

Records Found: 3 Search Type: Starting Search Criteria: Carolina Christian Academy  
Search Time: 5/15/2019 12:15 PM [Search Again](#)

Entity Name			Actions
Sos Id	Date Formed	Status	Type
<a href="#">Carolina Christian Academy</a> Prev Legal Name(s) Carolina Christian Academy and College Carolina Christian Academy Free Pilgrim Academy			<a href="#">+</a> <a href="#">-</a> <a href="#">+</a> <a href="#">-</a>
0022048	8/18/1969	Current - Active	Non - Profit Corporation
<a href="#">Carolina Classical School</a> Prev Legal Name(s) CAROLINA CHRISTIAN ACADEMY, INC.			<a href="#">+</a> <a href="#">-</a> <a href="#">+</a> <a href="#">-</a>
0501735	7/30/1999	Current - Active	Non - Profit Corporation
<a href="#">Carolina Christian Academy of Hayesville, Inc.</a>			<a href="#">+</a> <a href="#">-</a> <a href="#">+</a> <a href="#">-</a>
1433765	3/17/2015	Current - Active	Non - Profit Corporation







South Carolina Secretary of State *Mark Hammond*

# Business Entities Online

File, Search, and Retrieve Documents Electronically

In partnership with SC.GOV





Log In

## Business Name Search

### To Search

Enter the business name of the company you wish to view and click "Search." Find the business in the results below and click to view the official business profile and relevant information.

### To File for an Existing Business

Enter the business name of the company for which you wish to file documents and click search. Find the business in the results below and click to view the official business profile. From your business's profile click the "Add Filing" button.

Results displayed will show entities that contain your search criteria.

Search by Business Name

Begins With

Oconee Christian Academy

Search

See results below

Add New Entity

Search Results

Displaying 1 record(s)

Entity Name	Date of Incorporation	Entity Type	Entity Status	Incorporated State
<a href="#">OCONEE CHRISTIAN ACADEMY, INC.</a>	07/01/1993	Nonprofit	Good Standing	South Carolina





# Tennessee



**Tennessee  
Secretary of State**  
Tre Hargett

Search:

1-2 of 2

Search Name:

☒ Starts With ☐ Contains

Control #:

Active Entities Only: ☐

Search

Control #	Entity Type	Name	Name Type	Name Status	Entity Filing Date	Entity Status
<a href="#">000438072</a>	NCORP	MONTESSORI WORLD OF CHILDREN FOUNDATION TENNESSEE	Entity	Inactive	12/12/2002	Inactive - Dissolved (Administrative)
<a href="#">000438071</a>	LLC	MONTESSORI WORLD OF CHILDREN, LLC TENNESSEE	Entity	Inactive	12/12/2002	Inactive - Dissolved (Administrative)

1-2 of 2

Business Services Online > Find and Update a Business Record

## Business Information Search

As of May 15, 2019 we have processed all corporate filings received in our office through May 14, 2019 and all annual reports received in our office through May 14, 2019.

Search by business name or [Secretary of State Control Number](#) in order to file annual reports and other amendments or to view the business detail.

Search:

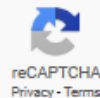
Search Name:

☒ Starts With ☐ Contains

Control #:

Active Entities Only: ☐

✓ I'm not a robot



Search



## Founding History

The Montessori philosophy came to Chattanooga in 1973 when Roberta (Bobbe) Spink started The Montessori World of Children in a small house on Signal Mountain. In 1981, Bobbe and her husband moved the school to a leased building downtown, a location that would allow children from all parts of Chattanooga and the surrounding areas to attend.

The Montessori World of Children became The Montessori School in 2004, when staff and parents worked together to form a non-profit board for the growing school. This now includes three toddler classes, four preschool classes, a full elementary (grades 1-5), and middle school (grades 6, 7, and 8), with a total enrollment of 250.

Search: 1-5 of 5

Search Name:  ☐ Starts With ☒ Contains

Control #:

Active Entities Only: ☐

Search

Control #	Entity Type	Name	Name Type	Name Status	Entity Filing Date	Entity Status
<a href="#">000464753</a>	NCORP	THE MONTESSORI SCHOOL TENNESSEE	Entity	Active	03/03/2004	Active
<a href="#">000488660</a>	NCORP	The Montessori School at Bemis Parent Teacher Organization, Inc. TENNESSEE	Entity	Inactive	03/02/2005	Active
<a href="#">000487595</a>	CORP	The Montessori School of Cleveland, Inc. TENNESSEE	Entity	Active	02/15/2005	Active
<a href="#">000747140</a>	CORP	The Montessori School of Donelson, Inc. TENNESSEE	Entity	Inactive	02/11/2014	Inactive - Dissolved (Administrative)
<a href="#">000784341</a>	NCORP	The Montessori School of Memphis TENNESSEE	Entity	Inactive	01/12/2015	Inactive - Dissolved (Administrative)

1-5 of 5



# Updates to Resources

# Equitable Services for Private Schools (ES4PS)

- GaDOE is in its final stages of developing an online platform for the implementation of equitable services in Georgia.
- The platform is housed in the GaDOE State Longitudinal Data System (SLDS) accessible to LEA Federal Programs Directors. It allows LEA staff to
  - Maintain Private School Contact Information
  - Issue Equitable Services Consultation Invitations
  - Indicate Private School Participation in Equitable Services (Form A)
  - Verify Receipt of Equitable Services and Ongoing Consultation (Form B)

# Equitable Services for Private Schools (ES4PS)

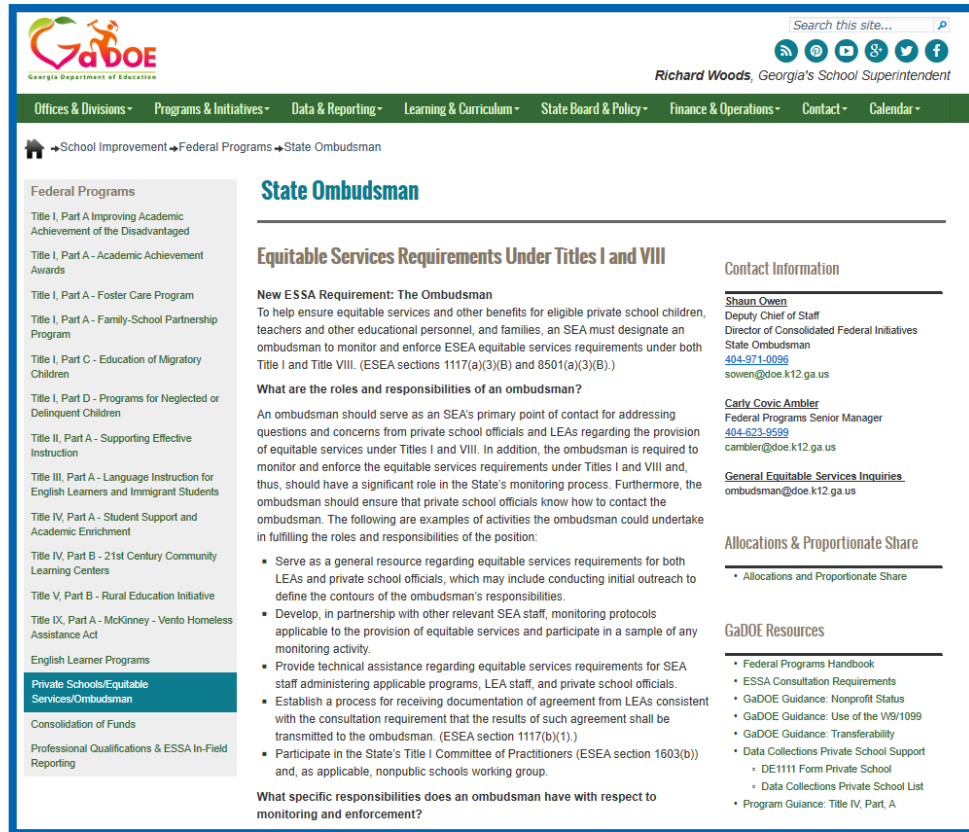
- The platform also allows LEAs to customize invitation templates and track invitations and form submission.
- The platform allows the state to better serve both private schools and districts.
- This allows private schools to complete the information virtually.

# Equitable Services for Private Schools (ES4PS)

	Equitable Services 2017-2018	Equitable Services 2018-2019	Equitable Services 2019-2020	Equitable Services 2020-2021
<b>Invitations</b>	On File at LEA	On File at LEA	On File at LEA	<b>Due October 2019</b> Use ES4PS
<b>Form A</b>	On File at LEA	On File at LEA	<b>Due June 30, 2019</b> Use ES4PS <u>OR</u> FY20 ConApp Attachments	<b>Due June 30, 2020</b> Use ES4PS
<b>Form B</b>	<b>Due February 2019</b> ES4PS <u>OR</u> FY18 ConApp Attachments <u>OR</u> FY19 ConApp Attachments	<b>Due December 2019</b> Use ES4PS	<b>Due December 2020</b> Use ES4PS	<b>Due December 2021</b> Use ES4PS



# Equitable Services for Private Schools (ES4PS)



The screenshot shows the Georgia Department of Education (GaDOE) website. The header includes the GaDOE logo, a search bar, and social media icons. The navigation menu lists various departments and programs. The main content area is titled "State Ombudsman" and includes a sidebar with a list of federal programs. The main text discusses the "Equitable Services Requirements Under Titles I and VIII" and provides contact information for Shaun Owen, Deputy Chief of Staff, and Carly Covic Ambler, Federal Programs Senior Manager. It also lists "Allocations & Proportionate Share" and "GaDOE Resources".

**State Ombudsman**

**Equitable Services Requirements Under Titles I and VIII**

**New ESSA Requirement: The Ombudsman**

To help ensure equitable services and other benefits for eligible private school children, teachers and other educational personnel, and families, an SEA must designate an ombudsman to monitor and enforce ESEA equitable services requirements under both Title I and Title VIII. (ESEA sections 1117(a)(3)(B) and 8501(a)(3)(B).)

**What are the roles and responsibilities of an ombudsman?**

An ombudsman should serve as an SEA's primary point of contact for addressing questions and concerns from private school officials and LEAs regarding the provision of equitable services under Titles I and VIII. In addition, the ombudsman is required to monitor and enforce the equitable services requirements under Titles I and VIII and, thus, should have a significant role in the State's monitoring process. Furthermore, the ombudsman should ensure that private school officials know how to contact the ombudsman. The following are examples of activities the ombudsman could undertake in fulfilling the roles and responsibilities of the position:

- Serve as a general resource regarding equitable services requirements for both LEAs and private school officials, which may include conducting initial outreach to define the contours of the ombudsman's responsibilities.
- Develop, in partnership with other relevant SEA staff, monitoring protocols applicable to the provision of equitable services and participate in a sample of any monitoring activity.
- Provide technical assistance regarding equitable services requirements for SEA staff administering applicable programs, LEA staff, and private school officials.
- Establish a process for receiving documentation of agreement from LEAs consistent with the consultation requirement that the results of such agreement shall be transmitted to the ombudsman. (ESEA section 1117(b)(1).)
- Participate in the State's Title I Committee of Practitioners (ESEA section 1603(b)) and, as applicable, nonpublic schools working group.

**What specific responsibilities does an ombudsman have with respect to monitoring and enforcement?**

**Contact Information**

**Shaun Owen**  
Deputy Chief of Staff  
Director of Consolidated Federal Initiatives  
State Ombudsman  
[404-971-0096](tel:404-971-0096)  
[sowen@doe.k12.ga.us](mailto:sowen@doe.k12.ga.us)

**Carly Covic Ambler**  
Federal Programs Senior Manager  
[404-623-9599](tel:404-623-9599)  
[cambler@doe.k12.ga.us](mailto:cambler@doe.k12.ga.us)

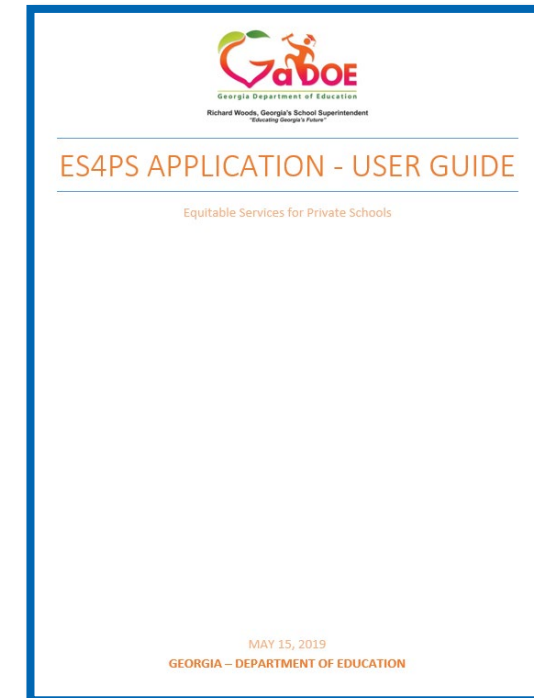
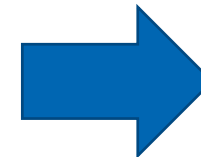
**General Equitable Services Inquiries**  
[ombudsman@doe.k12.ga.us](mailto:ombudsman@doe.k12.ga.us)

**Allocations & Proportionate Share**

- Allocations and Proportionate Share

**GaDOE Resources**

- Federal Programs Handbook
- ESSA Consultation Requirements
- GaDOE Guidance: Nonprofit Status
- GaDOE Guidance: Use of the W9/1099
- GaDOE Guidance: Transferability
- Data Collections Private School Support
  - DE1111 Form Private School
  - Data Collections Private School List
- Program Guidance: Title IV, Part A



The cover of the "ES4PS APPLICATION - USER GUIDE" is displayed. It features the GaDOE logo at the top, followed by the title "ES4PS APPLICATION - USER GUIDE" in large orange letters. Below the title is the subtitle "Equitable Services for Private Schools". At the bottom, it says "MAY 15, 2019" and "GEORGIA - DEPARTMENT OF EDUCATION".

**ES4PS APPLICATION - USER GUIDE**

Equitable Services for Private Schools

MAY 15, 2019  
GEORGIA - DEPARTMENT OF EDUCATION

# Initial Consultation Meetings

- GaDOE will NOT be hosting statewide meetings in 2019-2020
- LEAs might consider:
  - Collaborating to provide regional meetings
  - Scheduling one district meeting for all private schools to attend
  - Meeting with private schools one-on-one
- GaDOE will provide training resources that may be use in initial consultation. Resources should be released in July and will be announced.



# Hot Topics

# Allocations

- USDE to GaDOE
  - May or June 2019
- GaDOE to LEA
  - Preliminary are posted
  - July 2019
- LEA to Private Schools
  - July 2019
  - Subject to adjustment upon final budget approval



# Carryover – 2016 Fiscal Changes NRG

## *Questions N-6, N-7*

### **Obligation of Funds**

- Funds allocated to an LEA for educational services and other benefits to eligible private school children, teachers and other educational personnel, and families must be obligated in the fiscal year for which the funds are received by the LEA. (ESEA sections 1117(a)(4)(B) and 8501(a)(4)(B).)
- However, there may be extenuating circumstances in which an LEA is unable to obligate all funds within this timeframe in a responsible manner. Under these circumstances, the funds may remain available for the provision of equitable services under the respective program during the subsequent school year. In determining how such carryover funds will be used, the LEA must consult with appropriate private school officials. (ESEA sections 1117(b) and 8501(c).)

# Carryover – 2019 DRAFT Equitable Services NRG

## Obligation of Funds

- **B-25. What is the purpose of the obligation of funds requirement given that an LEA may carry over funds from a given fiscal year and spend those funds in the succeeding fiscal year?**

The purpose of this requirement is to ensure that an LEA uses the funds available under Title I to provide equitable services in the fiscal year for which the funds were appropriated so that eligible students, teachers and other educational personnel, and families receive the services to which they are entitled in a timely manner. This provision reinforces the requirement that an LEA conduct timely consultation with private school officials to design appropriate equitable services so that those services can begin at the beginning of the school year for which the funds are appropriated.

- **B-26. May an LEA carry over unobligated funds despite this new statutory requirement regarding obligation of funds?**

The Department expects that LEAs will comply with the law and obligate the funds allocated for equitable services in the year for which they are appropriated. Occasionally, however, there may be circumstances in which an LEA is unable to obligate all funds within this timeframe in a responsible manner. Examples of such circumstances might include a natural disaster that delayed services for public and private school students or a situation in which an LEA has a small amount of unobligated funds after having provided equitable services that cost less than the amount generated. Under these circumstances, an LEA must carry over the unobligated funds from the proportional share for the provision of equitable services during the subsequent fiscal year. In determining how such carryover funds will be used, the LEA must consult with appropriate private school officials.



# Administrative Caps

ESSA Program	Maximum Percentage for Administration
Title I, Part A – Improving the Academic Achievement of the Disadvantaged	≤ 10%
Title I, Part C – Education of Migratory Children	≤ 2%
Title II, Part A – Supporting Effective Instruction	≤ 10%
Title III, Part A – Language Instruction for English Learners and Immigrant Students	≤ 2%
Title IV, Part A – Student Support and Academic Enrichment	≤ 2%
Title IV, Part B – 21 <sup>st</sup> Century Community Learning Center (CCLC)	≤ 10%

# How are administrative costs determined?

- **B-33. How does an LEA reserve Title I funds for its administration of the Title I program to provide equitable services for private school students?**

After consultation with private school officials, an LEA may reserve an amount that is reasonable and necessary from the proportional share for the LEA's administration of equitable services. (See 2 C.F.R. § 200.403(a)). (This term refers to administrative activities that are directly attributable to the equitable services program such as the time an LEA's Federal programs director spends on equitable services; it does not refer to indirect costs, discussed below in B-37.) An LEA determines this amount separately from the amount of funds needed for the administration of the Title I program for students in public schools. ESEA section 1117(b)(1)(E) requires the LEA to consult with appropriate private school officials about the size and scope of the equitable services for eligible private school children. Therefore, because the amount of the proportional share used for administration directly affects the size and scope of equitable services, the LEA must consult with private school officials regarding the administrative costs for implementing equitable services before it decides the amount to reserve for this purpose. If an LEA is considering charging indirect costs to the proportional share, as discussed below in B-37, this would also be a topic during consultation in addition to discussing administrative costs during consultation.

# What are Administrative Costs?

- Grant management – Consultation (Time, Travel, Materials)
- Processing purchase orders
- Registering participants for professional development
- Negotiating contracts – 3rd party
- Conducting accounting activities – budgeting, reconciliations
- Collecting travel documentation
- Processing reimbursements
- Maintaining Documentation – including inventory
- Program implementation and monitoring

# Transferability – 2016 Fiscal Changes NRG

- **U-4. What are the responsibilities of an SEA or LEA for the provision of equitable services to private school children and teachers with respect to funds being transferred?**

Excluding Title I, Part D and Title V, Part B, each program covered by the transferability authority is subject to the equitable services requirements under Title I or VIII, which may not be waived. (ESEA section 8401(c)(5).) Before an SEA or LEA may transfer funds from a program subject to equitable services requirements, it must engage in timely and meaningful consultation with appropriate private school officials. (ESEA section 5103(e)(2).) With respect to the transferred funds, the SEA or 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.

- **U-5. May an SEA or LEA transfer only those funds that are to be used for equitable services to private school students or teachers?**

No. An SEA or LEA may not transfer funds to a particular program solely to provide equitable services for private school students or teachers. Rather, an SEA or LEA, after consulting with appropriate private school officials, must provide equitable services to private school students and teachers based on the rules of each program and the total amount of funds available to each program after a transfer. (See ESEA section 5103(e).)

# Transferability – 2019 DRAFT Equitable Services NRG

- **B-24. May an LEA, after timely and meaningful consultation, retain funds in a program from which it transfers funds to Title I solely to provide equitable services under that program?**

No. Just as an LEA may not transfer funds to a particular program solely to provide equitable services, it may not retain funds solely for this purpose. Thus, if an LEA chooses to transfer its Title II, Part A or Title IV, Part A funds to Title I, it may not retain a portion of those funds solely to provide equitable services under Title II, Part A or Title IV, Part A. Under this scenario, an LEA would apply the proportional share available for equitable services to all Title I funds, including the amounts transferred into Title I. (ESEA section 5103(e)(1)).



# Equitable Services Working Group

*Offering a holistic education to **each and every child** in our state.*





# Equitable Services Working Group

Calling for Volunteers!

- GaDOE is looking for participants for their FY20 Equitable Services Working Group.
- We hope for individuals that represent:
  - New and Veteran Private School Officials
  - New and Veteran Public School Officials
  - Varying types & locations of private schools
  - Varying sizes & locations of school districts
- Passionate individuals who support student success
- Meetings: Quarterly – Annually as needed
- Location: Virtual





# Question and Answer



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