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

<table>
<thead>
<tr>
<th>Ombudsman</th>
<th>For general inquiries regarding equitable services in Georgia</th>
<th><a href="mailto:ombudsman@doe.k12.ga.us">ombudsman@doe.k12.ga.us</a></th>
</tr>
</thead>
<tbody>
<tr>
<td>Shaun Owen</td>
<td>Deputy Chief of Staff Director of Consolidated Federal Initiatives, State Ombudsman</td>
<td><a href="mailto:sowen@doe.k12.ga.us">sowen@doe.k12.ga.us</a></td>
</tr>
<tr>
<td>Carly Covic Ambler</td>
<td>Federal Programs Senior Manager</td>
<td><a href="mailto:cambler@doe.k12.ga.us">cambler@doe.k12.ga.us</a></td>
</tr>
<tr>
<td>Dr. Ken Banter Marijo Pitts Sheffield Elaine Dawsey</td>
<td>Program Manager, Title I, Part A Specialist, Title I, Part A Specialist, Title I, Part A</td>
<td><a href="mailto:kbanter@doe.k12.ga.us">kbanter@doe.k12.ga.us</a> <a href="mailto:mpitts@doe.k12.ga.us">mpitts@doe.k12.ga.us</a> <a href="mailto:edawsey@doe.k12.ga.us">edawsey@doe.k12.ga.us</a></td>
</tr>
<tr>
<td>Israel Cortez</td>
<td>Program Manager, Title I, Part C</td>
<td><a href="mailto:jcoritez@doe.k12.ga.us">jcoritez@doe.k12.ga.us</a></td>
</tr>
<tr>
<td>Chris Leonard</td>
<td>Specialist, Title II, Part A</td>
<td><a href="mailto:cleonard@doe.k12.ga.us">cleonard@doe.k12.ga.us</a></td>
</tr>
<tr>
<td>Dr. Meg Baker</td>
<td>Program Manager, Title III, Part A &amp; ESOL Language Programs</td>
<td><a href="mailto:mbaker@doe.k12.ga.us">mbaker@doe.k12.ga.us</a></td>
</tr>
<tr>
<td>Dawna Hatcher</td>
<td>Program Manager, Title IV, Part A</td>
<td><a href="mailto:mpitts@doe.k12.ga.us">mpitts@doe.k12.ga.us</a></td>
</tr>
<tr>
<td>Deidre Smith</td>
<td>Program Manager, Title IV, Part B, 21st Century Community Learning Centers</td>
<td><a href="mailto:desmith@doe.k12.ga.us">desmith@doe.k12.ga.us</a></td>
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</table>
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
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
### Business Search Results

<table>
<thead>
<tr>
<th>Business Name</th>
<th>Control Number</th>
<th>Principal Office Address</th>
<th>Registered / Designated Agent Name</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE FRIENDS SCHOOL OF ATLANTA, INC.</td>
<td>K011848</td>
<td>862 COLUMBIA DR, DECATUR, GA, 30030, USA</td>
<td>WANDA FRENCH</td>
<td>Domestic Nonprofit Corporation</td>
</tr>
</tbody>
</table>

**Page 1 of 1, records 1 to 1 of 1**
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

Search Results

Displaying 1 record(s)

<table>
<thead>
<tr>
<th>Entity Name</th>
<th>Date of Incorporation</th>
<th>Entity Type</th>
<th>Entity Status</th>
<th>Incorporated State</th>
</tr>
</thead>
<tbody>
<tr>
<td>OCONEE CHRISTIAN ACADEMY, INC.</td>
<td>07/01/1993</td>
<td>Nonprofit</td>
<td>Good Standing</td>
<td>South Carolina</td>
</tr>
</tbody>
</table>
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.

Business Services Online > Find and Update a Business Record
The Montessori philosophy came to Chattanooga in 1973 when Roberta (Robbie) Spink started The Montessori World of Children in a small house on Signal Mountain. In 1981, Bobbie 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, and the school and parents worked together to form a non-profit organization. The school now offers a pre-kindergarten class, a full elementary (grades 1-5), and middle school (grades 6, 7, and 8), with a total enrollment of 250.
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 platforms 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)

<table>
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<tbody>
<tr>
<td><strong>Invitations</strong></td>
<td>On File at LEA</td>
<td>On File at LEA</td>
<td>On File at LEA</td>
<td><strong>Due October 2019</strong>&lt;br&gt;Use ES4PS</td>
</tr>
<tr>
<td><strong>Form A</strong></td>
<td>On File at LEA</td>
<td>On File at LEA</td>
<td><strong>Due June 30, 2019</strong>&lt;br&gt;Use ES4PS&lt;br&gt;<strong>OR</strong>&lt;br&gt;FY20 ConApp Attachments</td>
<td><strong>Due June 30, 2020</strong>&lt;br&gt;Use ES4PS</td>
</tr>
<tr>
<td><strong>Form B</strong></td>
<td><strong>Due February 2019</strong>&lt;br&gt;ES4PS &lt;br&gt;OR&lt;br&gt;FY18 ConApp Attachments&lt;br&gt;<strong>OR</strong>&lt;br&gt;FY19 ConApp Attachments</td>
<td><strong>Due December 2019</strong>&lt;br&gt;Use ES4PS</td>
<td><strong>Due December 2020</strong>&lt;br&gt;Use ES4PS</td>
<td><strong>Due December 2021</strong>&lt;br&gt;Use ES4PS</td>
</tr>
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Equitable Services for Private Schools (ES4PS)
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 used 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
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).)
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 fiscal 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

<table>
<thead>
<tr>
<th>ESSA Program</th>
<th>Maximum Percentage for Administration</th>
</tr>
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<tbody>
<tr>
<td>Title I, Part A – Improving the Academic Achievement of the Disadvantaged</td>
<td>≤ 10%</td>
</tr>
<tr>
<td>Title I, Part C – Education of Migratory Children</td>
<td>≤ 2%</td>
</tr>
<tr>
<td>Title II, Part A – Supporting Effective Instruction</td>
<td>≤ 10%</td>
</tr>
<tr>
<td>Title III, Part A – Language Instruction for English Learners and Immigrant Students</td>
<td>≤ 2%</td>
</tr>
<tr>
<td>Title IV, Part A – Student Support and Academic Enrichment</td>
<td>≤ 2%</td>
</tr>
<tr>
<td>Title IV, Part B – 21st Century Community Learning Center (CCLC)</td>
<td>≤ 10%</td>
</tr>
</tbody>
</table>
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)).
Offering a holistic education to each and every child in our state.

Equitable Services Working Group
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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