

Private School Participation in Federal Programs

Equitable Services designed to meet the needs of
Private School Students, Teachers, and Families

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Washington Office of Superintendent of
PUBLIC INSTRUCTION

Agenda

School districts that receive ESEA funds must set aside funds for services to private school teachers and students, authorized by each federal program, in compliance with federal laws and regulations. This presentation provides a broad overview of requirements for providing equitable services to private schools.

- ❖ Washington State Board of Education–Private School Process
- ❖ Equitable Services–The Basics
- ❖ Private School and District Roles and Responsibilities
- ❖ Consultation Process-Initial and Ongoing
- ❖ Federal Program Webpages and Contact Information, Additional Resources



Washington State Board of Education Private School Approval Process

Private School Approval

Washington State Board of Education (SBE)

- **To become an approved private school in Washington, schools must apply through SBE according to its timelines.**
- **For questions regarding the approval process for private schools, contact SBE at 360-725-6433, or Privateschools@k12.wa.us.**

Private School Approval

Change of Name or Private School Information

Private Schools can only make a change to their name once a year, during the yearly application approval process through SBE. During the rest of the year, schools will use an online form to change information.

To notify SBE of changes to the school's physical address, the Head of School, or contact information for the school use the [Private School Change of Information Form](#).

- Username: To log in, you will use the email address of your Head of School submitted on your most recent approval application.
- Password: Your School's Building Code.

If you have trouble logging in, please contact Nicole Mulhausen, PrivateSchools@k12.wa.us.



Equitable Services The Basics

ESEA Federal Programs Available for Equitable Services

Detailed [program descriptions](#) are on OSPI's [Private School webpage](#).

Program	Services	Services Based On
Title I, Part A	Academic services for struggling students who would have attended a public Title I, Part A school where the student lives. Level of funding for services identified by number of eligible students whose families meet low-income criteria.	Student Eligibility
Title I, Part C	Academic services for migratory students and professional development (PD) for teachers of migratory students.	Student Eligibility
Title II, Part A	Professional learning activities for private school teachers and other education personnel.	Student Enrollment
Title III, Part A	Academic services for students who are English Learners (ELs) or Immigrant Children and Youth, and PD for their teachers.	Student Eligibility
Title IV, Part A	School-level services that support a well-rounded education, improved conditions for student learning, and improved use of instructional technology.	Student Enrollment
Title IV, Part B	Competitive grant program that provides academic enrichment through community learning centers for students of high poverty areas.	Competitive Grant Awardee Catchment Area/Student Eligibility
Carl D. Perkins	Opportunities for secondary students to attend CTE classes in public schools, and PD for private school CTE teachers.	Secondary Students/Teachers

Private School Eligibility for Participation In Equitable Services

Private schools may participate in federal program equitable services in school year 2023–24 if they:

- Are a state approved, non-profit, elementary or secondary school certified through the SBE.
- Complete the intent to participate portion of the **Private Participation in Federal Programs Application** in EDS. The application opens **mid-March** and is **due April 17, 2023**.

*** Applications must be received by the due date or the private school will not be eligible for participation.**

Equitable Services

A Partnership between School Districts and Private Schools

This is a collaborative process between educational entities based on **shared planning, responsive and accurate data reporting, and respect for timelines** to ensure timely services and supports for eligible students, teachers, other instructional staff, and parents.

School districts, private schools, and OSPI **each have specific roles** to ensure equitable services are provided in a timely and meaningful manner.



Equitable Services—A Cyclical Process

School District	Private School
	Private School Approval <ul style="list-style-type: none"> Annual approval process with the Washington SBE
Notification of Private Participation in Federal Programs Application—<i>Opens mid-March and closes April 17, 2023</i>	
<ul style="list-style-type: none"> District contacts private schools that have not completed their intent to participate via the Private Participation in Federal Programs application—<i>mid-March–April 17</i> School district completes Contact Log in EDS application 	<ul style="list-style-type: none"> Private school identifies the federal programs they would like to participate in by completing the Private Participation in Federal Programs application in EDS by <i>due date–April 17</i> Identify Fall 2022 low-income student counts
Initial & Ongoing Consultation Process	
<ul style="list-style-type: none"> Begin initial consultation—<i>Spring</i> District contacts private school for identification of eligible students or other data related to programs (Title I-A, Title I-C, Title III)—<i>Spring</i> District and private school continue consultations to identify services and possible service providers—<i>Spring/Early Fall</i> 	<ul style="list-style-type: none"> Participate in initial consultation—<i>Spring</i> Provide appropriate and timely student data upon request of the district—<i>Spring</i> District and private school continue consultations to identify services and possible service providers—<i>Spring/Early Fall</i>
Delivery of Services	
<ul style="list-style-type: none"> District secures and initiates services—<i>Early Fall</i> District monitors services and consults with private schools <i>throughout school year</i> to ensure services remain appropriate 	<ul style="list-style-type: none"> Private school provides student data related to specific program requirements for services (achievement data, language assessment data) to begin services—<i>Early Fall</i>
Evaluation of Services	
<ul style="list-style-type: none"> District, private school, and service provider evaluate success of services—<i>Ongoing</i> 	<ul style="list-style-type: none"> District, private school, and service provider evaluate success of services—<i>Ongoing</i>

Equitable Services

The Basics

❖ **Equitable Services**

Services to private schools should be *equitable to the public school, not identical*. They should be designed to meet the needs of private school students and teachers.

❖ **Equal Expenditures on a Per-Pupil Basis**

Expenditures must be equal to the amount of funds expended for participating public school students and teachers.

❖ **Same Start Date**

Services to private schools should ideally begin at the same time as services begin in public schools.

Key Word Is Services

- Services and materials only.
- District maintains administrative control over services and materials.
- Districts do not distribute federal funds directly to private schools.
- No reimbursement to private schools.
- District monitors teachers and providers who deliver services.



Private School and District Roles and Responsibilities

Private Participation in Federal Programs

Application in EDS

The application is in the [Educational Data System \(EDS\)](#).
See the [EDS Log-In Instructions](#) to get started.



The screenshot shows the Washington State Office of Superintendent of Public Instruction (OSPI) website. The navigation bar includes 'Home', 'My Applications', and 'Profile'. The left sidebar lists various application categories. The main content area, titled 'My Applications', includes a section for 'My Application List' which contains a table of available applications. A blue arrow points from the text above to the 'Private Participation in Federal Programs' link in the table.

Application
E-Certification
Education Data System
Education Data System Administration
Events Manager
Honors Award Nomination
iGrants
Learning Assistance Program
NBPTS Scholarship
pdEnroller
Private Participation in Federal Programs
Program Monitor

Private School Responsibilities

Accessing the Application

Each year, private schools must indicate their intent to participate through the **Private Participation in Federal Programs Application** in EDS.

1. Log into EDS: <https://eds.ospi.k12.wa.us>. If you do not have an EDS account, click the Create an Account tab and follow the instructions. Then go to step 4 below.
2. Enter your username and password.
3. Click Login. You will be asked to agree to the conditions of using EDS. Click on I agree.
4. Click on the tab "My Applications."

Private School Responsibilities

Accessing the Application

5. Next, click on the link for Private Participation in Federal Programs. If the application does not appear in your list of applications, email customersupport@k12.wa.us with the following:

Subject: Access to Private Participation in Federal Programs Application

Body: I am requesting access to the Private Participation in Federal Programs Application in EDS.

Provide your first, middle, and last name, DOB, EDS Account Username, and the private school's organization (building) code.

Private School Roles and Responsibilities

See detailed [Private school directions](#) for private schools participating in federal programs.

1. Enter Federal Tax ID number.
2. Choose Participation or Nonparticipation.
3. Check federal program boxes to indicate participation in specific programs.
4. Enrollment data is pre-populated based on October 2022 data.
5. Complete low-income student enrollment (use October 2022 data) if Title I, Part A is selected to participate.
6. Select the school districts where your students reside (necessary for Title I-A and Title IV-B).

Important! Submit the application even if the private school chooses non-participation. Enter accurate data for each item. Once submitted, the application cannot be modified by the private school.

School District Roles and Responsibilities

Find [detailed district directions](#) on [OSPI's Private School Participation in Federal Programs](#) webpage.

Private School Participation in Federal Programs

The students, parent/guardians, and educators of non-profit, private schools–approved by the [Washington State Board of Education](#)–may be eligible for services provided through some Elementary Secondary Education Act (ESEA) federal education programs. These services can provide a valuable supplement to the core programming and professional development of participating private schools.

Program Basics	+
School District Requirements	+
Private School Requirements	+
Federal Programs & Non-Regulatory Guidance/Legislation	+

Subscribe to receive Private Education and Title I, Part A email updates.

Participation in Federal Programs Webinar

OSPI's Federal Program Equitable Services Ombudsmen hosted a webinar focusing on the requirements and procedures for school districts and private schools for the 2022–23 school year.

School District Roles and Responsibilities

If you do not have access to the Private Participation in Federal Programs application in EDS, contact your [District Security Manager](#).

- Log into EDS: <https://eds.ospi.k12.wa.us>.
- Go to the ***Detail View tab*** to view:
 - Non-Participating Schools
 - Participating Schools
 - Schools Not Applied

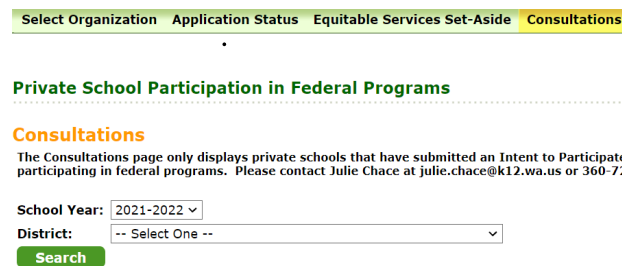
School District Roles and Responsibilities

After Private Participation in Federal Program application opens, districts are required to contact private schools in their district's boundaries to notify them that the application is open and of the availability of participation in federal programs.

- Districts **MUST** make at least three attempts to contact each private school prior to the close date of the application.
Districts are required to log all attempts in the *Contact Log*.
- Districts must make these attempts at contact using various methods, ex: emails, phone calls, letters, etc.
- If a private school does not respond after two attempts to contact, districts must send the private school a certified letter. If the private school does not respond, it will be considered non-participating.

School District Required Documentation

Upload ESSA required documentation under the "CONSULTATIONS" tab for in-district participating private schools. Reminder, there is no upload requirement for out-of-district private schools.



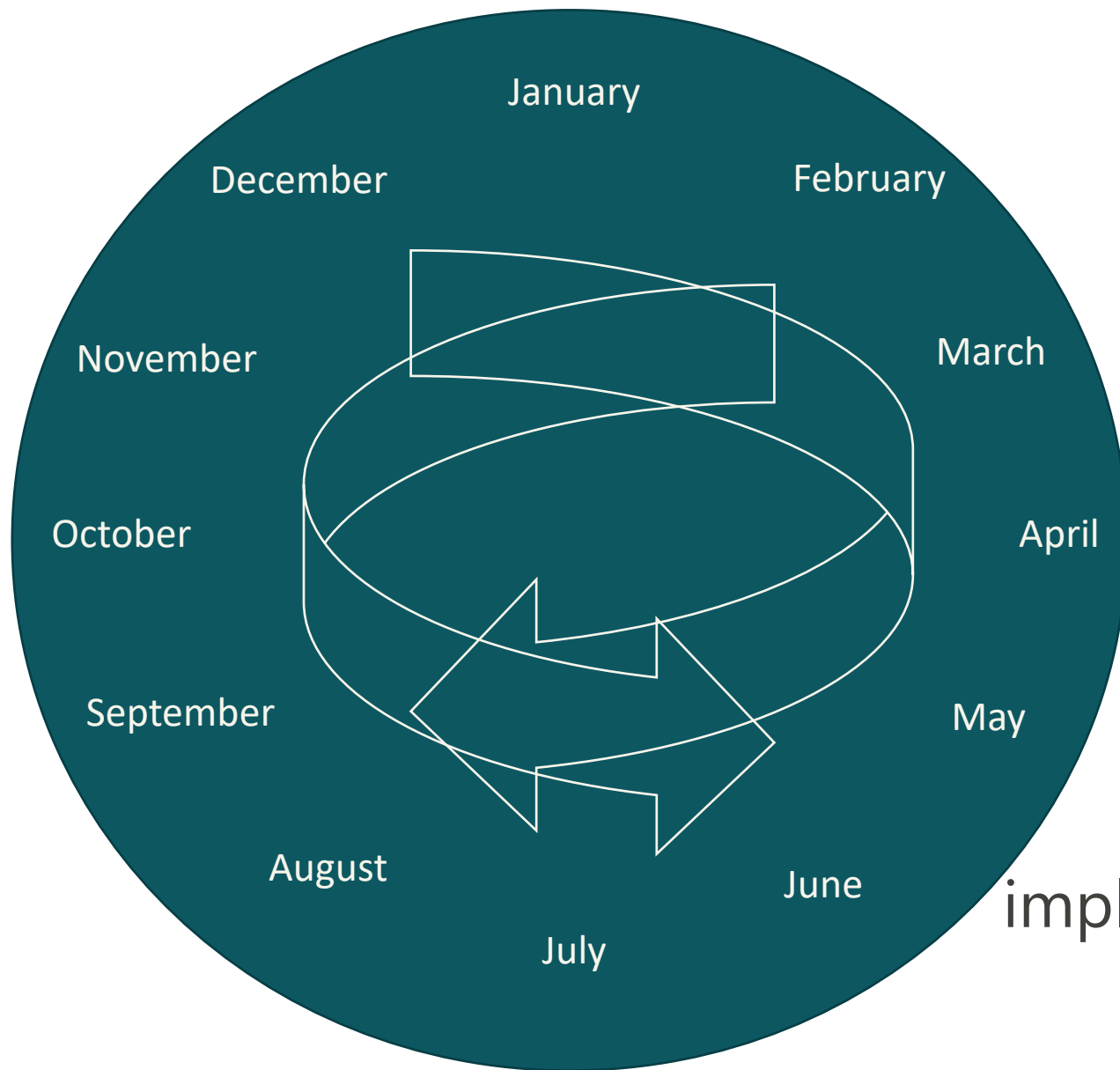
The screenshot shows a web interface with four tabs: 'Select Organization', 'Application Status', 'Equitable Services Set-Aside', and 'Consultations'. The 'Consultations' tab is highlighted in yellow and has a blue arrow pointing to it from the text above. Below the tabs is a section titled 'Private School Participation in Federal Programs'. Under this, there is a sub-header 'Consultations' in orange. A note states: 'The Consultations page only displays private schools that have submitted an Intent to Participate participating in federal programs. Please contact Julie Chace at julie.chace@k12.wa.us or 360-72'. Below the note are two dropdown menus: 'School Year:' with '2021-2022' selected, and 'District:' with '-- Select One --' selected. A green 'Search' button is at the bottom.

- Enter Dates of Consultation.
- Upload the signed [Affirmation of Consultation](#) for each participating private school (regardless of program).
- Upload the signed [Title I, Part A Record of Agreed Upon Services](#), if applicable.
- Electronic signatures are acceptable.

Consultation Process Initial and Ongoing



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Timely and
Meaningful
Consultation...

...must continue
throughout the
implementation and
assessment of
services.



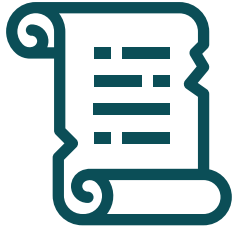
Consultation Process is Key!

Timely and Meaningful

Every spring, districts must begin planning to initiate timely and meaningful consultation with appropriate private school officials.

- Districts should begin reaching out to all private schools that have indicated participation in federal programs once the application closes in April.
- The goal of the consultation process is to reach agreement on how to provide equitable and effective programs for eligible private school children and teachers.
- **Timely** consultation should occur before the district makes any decisions about opportunities for private school students' and teachers' participation.
- **Meaningful** consultation includes the genuine opportunity for private schools to express their views. The district may initiate consultation with a proposal for services.
- **Ongoing** consultation should continue throughout the implementation and assessment of services.

Consultation-Overview



Consultation

The district is responsible for making “timely and meaningful” connections with the private schools located within their district boundaries, AND outside of district boundaries if they have indicated they want to participate in Title I, Part A equitable services. HINT: Think of private schools as additional Title I schools to help you remember to include them in your planning process.



Working Together

Decisions regarding services and the evaluation process are agreed upon through consultation to ensure timely, appropriate, and meaningful supplemental services to eligible students, teachers, and families for each private school. One size does not fit all!



Structured Support/Ongoing Monitoring & Evaluation

Districts continue to provide support throughout the school year by monitoring the services, providing adjustments as needed, and evaluating impact.





Working Together

Initial Consultation-

Must occur before the district makes any decisions that affect the opportunities of private school students and teachers to receive equitable services.

Initial Consultation-

Identify and Initiate services to support:

- Student needs
- Parent/Family needs
- Teacher needs

Initial Consultation-

- Format-
How/When
- Establish
deadlines
- Equity in
Availability





Working Together

Ongoing Consultation

Prior-to begin plans for program implementation.

During-to confirm plans are being executed as designed and agreed upon.

After-to verify that services occurred as planned and were equitable.

Effectiveness of Services

The district and private school must determine how the services will be academically assessed and how the results of that assessment will be used to improve services.

Transfers

Districts **MUST** communicate with participating private schools regarding the transfer of any funds **PRIOR** to the transfer.





Working Together

Key Ideas to Remember

Who initiates consultation, where does the consultation take place? The district must initiate the consultation process by extending an invitation to private school officials to set up a meeting time and place.

What forms are completed during consultation? Districts must complete the Affirmation of Consultation and, for private schools requesting to participate in Title I, the Title I Record of Agreed Upon Services.

Sending a letter explaining participation in equitable services and describing the available federal is not considered an adequate consultation. Likewise, a letter describing the services that a district intends to provide for private school students, without any prior consultation, is not sufficient to meet the consultation requirement.



Initial Consultation

Examples of Topics for Discussion

Identification of student's need, using data.

What services will be offered.

How, where, and by whom the services will be provided.

How the district will academically assess these services.

How the results of this assessment will improve future services.

Size and scope of equitable services the district will provide.

How much funding is available to serve private school students, teachers, educational personnel, and in some cases, parents, and if the funds will be pooled.



Initial Consultation

Discussing Transferability

Transferability

- Consult with private schools before any decisions are made that could affect the ability of private schools to benefit from programs for which they are eligible.
- Private school students and teachers must receive equitable services under the programs that the funds are transferred to.
- Eligible programs to transfer into other federal programs include:
 - ✓ Title II, Part A-Professional learning activities for private school teachers.
 - ✓ Title IV, Part A-School-level services that support a well-rounded education, improved conditions for student learning, and improved use of instructional technology.





Monitoring and Evaluating

Determine with private schools the standards and annual assessments for measuring progress of the program.

Define annual progress. Determine criteria for making program modifications if progress is not being achieved.

Provide ongoing support as needed. Assess the achievement of current year's program-did the services result in the agreed upon and expected outcomes?





Working Together

Consultation Disagreements

If the private school believes timely and meaningful consultation has not occurred or the district did not give due consideration to their views, they should first contact the school district to discuss these concerns.

OSPI Ombudsman

If the concern is not resolved satisfactorily, the private school should contact the OSPI Federal Program Ombudsman for assistance.

Complaint Procedures

If the concern is still unresolved, the private school has the right to file a complaint with OSPI. See [Complaint Procedures for Private Schools](#).



Out-of-District Guidance and Interlocal Agreements

- Title I, Part A requires districts to provide equitable services to eligible students outside district boundaries.
- OSPI will send the list of private schools outside the district's boundaries that may have eligible students. Districts can contact private schools directly or they can contact the "home" district of the private schools.
- A district may encourage private schools located within their boundaries to reach out to other districts where eligible private school students may reside.
- If a private school has eligible students from more than one district, they may pursue an interlocal agreement to arrange for one district to provide Title I, Part A services to all eligible private school students. [See our website for example interlocal agreements.](#)

Highly Capable Program

- There is no “equitable provision” of Highly Capable services for private school students as there are no federal funds, only state funding.
- Districts are responsible for enrolled K–12 students. Until a student enrolls, the district is not required to identify or offer services.
- Some districts enroll private school and homeschool students to receive part-time services (PE, library, Highly Capable).
- District-enrolled private school and homeschool students receive the same information about Highly Capable referral and selection as other students.
- The district determines what Highly Capable services to offer for enrolled private school and homeschool students who qualify.

For questions, contact Jody Hess, Program Supervisor, Highly Capable Student Program, jody.hess@k12.wa.us, or 360-725-6171.





Federal Program Contacts and Webpages
Additional Federal Program Resources

Federal Program Webpages and Contact Information

Federal Program Webpage	Email	Telephone
Title I, Part A Office	title1a@k12.wa.us	360-725-6100
Title I, Part C-Migrant Office	sylvia.reyna@k12.wa.us	360-725-4474
Title II, Part A Office	title2a@k12.wa.us	360-725-6340
Title III Office	kristin.percycalaff@k12.wa.us	360-725-6145
Title IV, Part A Office	cara.patrick@k12.wa.us	360-725-6507
Title IV, Part B Office	heidi.schultz@k12.wa.us	360-819-0045
Perkins/CTE Office	cte@k12.wa.us	360-725-6245



Equitable Services to Private Schools

Additional Resources

- OSPI's Private School Equitable Services Page
- Title I, Part A Non-Regulatory Guidance
- Draft Title VIII Non-Regulatory Guidance
- Title I, Part A Year-at-a-Glance 2022–23

If you have any questions, please feel free to put them in the chat.

Is there anything we didn't cover today that would be helpful?



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Thank you for joining us today!



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