

Private School Participation in Federal Programs

Equitable Services

Dr. Sheila Gerrish

Federal Programs Equitable Services Ombudsman

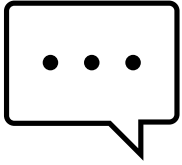
Julie Chace

Equitable Services Program Specialist

Office of Superintendent of Public Instruction (OSPI)



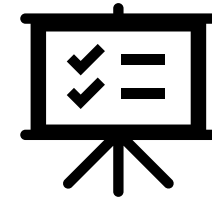
Housekeeping



Use Zoom chat feature for comments/reactions/links/questions



Click the "Live Transcript" button to enable closed captioning



Slides will be shared in the chat and posted, along with the recording, on the Private Participation webpage in the near future

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.

- ❖ [Equitable Services Federal Program Requirements– Key Principles](#)
- ❖ [OSPI Procedures for Participation in Equitable Services](#)
- ❖ [Consultation Process-Best Practices](#)
- ❖ [Title I Guidance–Out-of-District Procedures/Interlocal Agreements](#)
- ❖ [Private School Annual Approval and Renewal Process–SBE](#)
- ❖ [Federal Program Webpages, Contacts, Additional Resources](#)





Equitable Services
Federal Program Requirements
Key Principles

Equitable Services

Key Principles-ESEA requirements

- **Title I, Part A:** The Every Student Succeeds Act (ESSA), specifically, **Section 1117**, continues the requirement of the ESEA Act of 1965, requiring participating school districts, in consultation with appropriate private school officials, to provide eligible children attending private non-profit elementary and secondary schools, their teachers, and their families with Title I, Part A services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families.
- **Title VIII, Part F (all the other “Covered Federal Programs”)** **Section 8501(b)(1):** requires participating school districts to consult with appropriate private school officials, to provide equitable services to eligible private school children and their teachers or other educational personnel.



Equitable Services

Key Principles

❖ **Equitable Services**

Services to private schools should be *equitable to the public school, not identical; based upon data.*

❖ **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 (or as close as possible).

Equitable Services

Key Principles

Key Word: 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 on a regular basis services provided and evaluates impact.
- Not just for reading and math. Meant to address needs based upon data.

Equitable Services

Key Principles

Consultation—A Partnership between School Districts and Private Schools

- It is the responsibility of the public agency (Local Educational Agency (LEA); school district, etc.) to consult with private schools regarding equitable services.
- This is a collaborative process to ensure timely services and supports for eligible students, teachers, other instructional staff, and parents.
- Consultation must be “timely and meaningful.”
- The statute lists specific topics that must be covered.

Equitable Services

Key Principles

Consultation—A Partnership between School Districts and Private Schools

The intended outcome of consultation is to develop agreement between the school district and the private school(s).

- The school district must engage in timely and meaningful consultation.
- Sharing data is essential to identify eligible private school students that generate Title I, Part A funding.
- Later, academic data is also needed to identify students most in need of support if participating in Title I, Part A.

Equitable Services

Key Principles

Allocations: in the case of private school equitable services, allocation means the amount of funding available to provide services to participating private school students.

Title I, Part A

Private school allocation (**generating funds**) is based on private school students that live in a Title I, Part A served public school attendance area: Section 1117(c). (**Note:** this is different from the eligibility of students to participate in Title I, Part A services.)

Title VIII, Part F

Private school allocation is based on proportional enrollment in the public district and participating private schools (in general): Sections 8501(a)(1) and (a)(4)(A).

Equitable Services

Key Principles

Secular, Neutral, and Non-ideological Services

Educational services or other benefits, including materials and equipment must be secular, neutral, and nonideological.

- Section 1117(a)(2)
- Section 8501(a)(2)
- **Tip: After consultation**, when engaging in developing personal services contracts, if this language is not already present, it is a good idea to add an attestation that all services and other benefits, including materials and equipment used will be secular, neutral, and non-ideological.

Important Guidance Documents

- [Title I, Part A: Providing Equitable Services to Eligible Private School Children, Teachers, and Families Non-Regulatory Guidance \(updated May 17, 2023\)](#)
- [Title VIII, Part F: Equitable Services for Eligible Private School Children, Teachers, and Other Educational Personnel Non-Regulatory Guidance \(July 17, 2023\)](#)





OSPI Procedures for Participation in Equitable Services of Federal Programs

Detailed program descriptions are on OSPI's Private Participation in Federal Programs webpage.

*ESEA Federal Program Information and
Brief Description of Private School Equitable Services*

At-a-Glance Information

Program Name	Equitable Services (Supplemental Services)
Title I, Part A	Academic services for struggling students who would have attended a Title I public school where the student lives. Level of services identified by number of eligible students whose families meet low-income criteria. Low-income status is not a criteria for supplemental services.
Title I, Part C	Academic and non-academic services for migratory students and professional development (PD) for teachers of migratory students.
Title II, Part A	Professional learning activities for private school teachers, principals, and other school leaders.
Title III, Part A	Academic services for students who are English Learners or Immigrant Children and Youth, and PD for their 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.
Title IV, Part B	Academic enrichment through community learning centers for students of high poverty areas. This is a competitive grant program.
Carl D. Perkins	Opportunities for secondary students to attend CTE classes in public schools, and PD for teachers of private school CTE classes.

At-a-Glance: Equitable Services Timeline

Early March: Public School Districts remind in-district private schools the Private Participation in Federal Programs application is open in EDS and assist in completion of application if needed.

After application closes: Begin to set up initial consultation meetings with participating private schools

Spring

Spring/Summer

Agreed Upon Services begin, ideally when intervention services begin in public schools

Fall

Winter

Data collection and review of effectiveness of services.

Spring

Summer

Continue consultations for current school year.

Complete required documentation during initial consultation for upcoming school year.

Using OSPI list, contact and consult with out-of-district private schools to identify eligible students for Title I, Part A services.

District review of implementation fidelity and data to assess effectiveness of services to date. Make any needed adjustments.

Review effectiveness of services from previous year, discuss plans for upcoming school year.



At-a-Glance: Equitable Services Timeline for Spring into early Summer

After application closes: Begin to set up initial consultation meetings with participating private schools



Continue consultations for current school year.

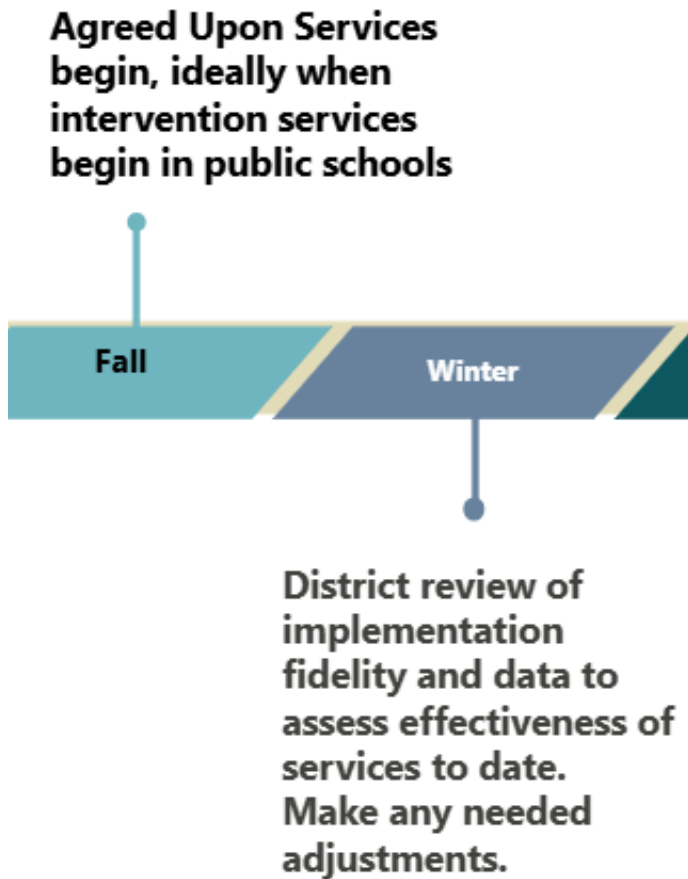
Complete required documentation during initial consultation for upcoming school year.

Using OSPI list, contact and consult with out-of-district private schools to identify eligible students for Title I, Part A services.

- Early March: Please alert in-district private schools that the application is open in EDS and assist completion if needed. April 30th closing.
- End of April: After the intent to participate information in EDS is closed, please begin the process to set up initial consultation meetings for the upcoming school year.
- In May, an out-of-district list will be shared in order to begin the consultation process with out-of-district private schools.



At-a-Glance: Equitable Services Timeline



- Funds available for equitable services are finalized for each program.
- Consultation regarding data review for which students will be receiving what services for Title I, Part A, or Title III, Part A, etc. (may be the same as the preliminary plan made in the spring but could be different).
- Contracts are finalized and services begin for students.
- Must be supplemental.
- Private school personnel may be hired if the supplemental supports are provided beyond their regular contract time.
- Plan for monitoring should also be clarified.



At-a-Glance: Equitable Services Timeline

Data collection and review of effectiveness of services.



Review effectiveness of services from previous year, discuss plans for upcoming school year.

- Plan for monitoring should be in place and observation should be occurring more than once within the year.
- At the end of the school year, analysis of the data is needed to evaluate the overall effectiveness of the supports and to make needed adjustments moving forward.



Equitable Services—A Cyclical Process

School District	Private School
	<p>Private School Approval</p> <ul style="list-style-type: none"> Annual approval process with the Washington SBE
<p>Notification to Private Schools of Private Participation in Federal Programs (intent to participate) application opening in EDS - <i>Opens early-March and closes Mid-April</i></p>	
<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>Early-March– Mid-April</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–Mid-April</i> Identify previous Fall low-income student counts
<p>Initial & Ongoing Consultation Process</p>	
<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>
<p>Delivery of Services</p>	
<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>
<p>Evaluation of Services</p>	
<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>

Eligibility for Participation In Equitable Services


Private schools may participate in federal program equitable services in school year 2026–27 if they:

- Are a state approved, non-profit, elementary or secondary school certified through the Washington State Board of Education (SBE).
- Complete the intent to participate portion of the **Private Participation in Federal Programs Application** in **EDS** which opens early-March and is due in April 2026.

Private School Responsibilities

Accessing the Application

The application (intent to participate in federal programs) is in OSPI's [Educational Data System \(EDS\)](#).
See the [EDS Log-In Instructions](#) to get started.



WASHINGTON STATE
OSPI Office of Superintendent
of Public Instruction

Home My Applications Profile

- > Application List
- > Application Roles
- > Education Directory
- > EDS Directory
- > Security Manager List

My Applications

My Application List

i The CTE Application section (Applic

You have access to the applications listed below

If you need access to more applications, please

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 and Completing 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."
5. Next, click on the link for Private Participation in Federal Programs.

Private School Responsibilities

Accessing and Completing the Application

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 Responsibilities

Accessing and Completing the Application

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 2025 data.
5. Complete low-income student enrollment (use October 2025 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 Responsibilities

School districts will be notified when the application opens in early March via GovDelivery.

Find [detailed district directions](#) on [OSPI's Private School 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.

Subscribe to receive Private Education and Title I, Part A email updates. [↗](#)

[Expand all](#)

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

Participation in Federal Programs Webinar

OSPI's Federal Program Equitable Services Ombudsman hosted a webinar focusing on the requirements and procedures for school districts and private schools for the 2026-27 school year.

School District Responsibilities

Districts can log into [EDS](#) and go to the Private Participation in Federal Programs Application to view past year and current year information for private schools in their boundaries.

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

In the application, use the **Detail View tab** to see information about the private schools including:

- Participating Schools (applications are complete)
- Schools Not Applied (applications have not yet been completed by private school)
- Non-Participating Schools

School District Responsibilities

After Private Participation in Federal Program application opens for the 2026–27 application in early March, and **BEFORE the application closes to private schools**, districts are required to contact private schools in their district's boundaries to notify them that the application is open and to assist them in completing the application if requested.

- Districts **MUST** make at least three attempts to contact each private school prior to the close date of the application, **April 30th**. **Districts are required to log all attempts in the *Contact Log in EDS***.
- 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 Responsibilities

Required Documentation

Upload ESSA required documentation under the "CONSULTATIONS" tab for in-district participating private schools.

Select Organization Application Status Equitable Services Set-Aside **Consultations**

Private School Participation in Federal Programs

Consultations

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

School Year: 2021-2022 ▾

District: -- Select One -- ▾

Search

For each in-district participating private school:

- Enter Dates of Consultation.
- Upload the signed [Affirmation of Consultation](#)
- Upload the signed [Title I, Part A Record of Agreed Upon Services](#), if applicable.
- If there is a change in participation or other information, enter a comment in the comment box.



Consultation Process Best Practices for Reaching Agreement

Successful Consultation

Key Principles

- Establishes positive and productive working relationships. **It's a partnership!**
- Is timely and meaningful.
- Makes planning and design of supports efficient. Preparation matters. Data matters.
- Continues throughout the implementation of equitable services.
- Serves to ensure that the services provided meet the needs of eligible private school children, their families and educators.



Successful Consultation

Timely and Meaningful

Every spring, districts must begin planning to initiate timely and meaningful consultation with private schools that have indicated they want to participate in federal programs for the upcoming school year.

Remember!

- **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.

Successful Consultation

Timely and Meaningful (continued)

- Consultation must occur **before** the district makes any decisions that affect the opportunities available to private schools. Particularly if a district is considering moving Title II, Part A and/or Title IV, Part A funds into Title I, Part A.
- Private school views must be given serious, due consideration during the consultation process.
- If the district disagrees with the private school on any topic subject to consultation, the district must provide, in a timely manner, a written explanation of the reasons they disagree, however, all final decisions rest with the district.

Reminder! Sending a letter describing equitable services is not considered an adequate consultation. Likewise, a letter describing the services that a district intends to provide, without any prior consultation, is **not** sufficient to meet the consultation requirement.

Consultation Documentation

During the initial consultation with participating private schools:

- Use the [Affirmation of Consultation](#) as a guide for what topics to discuss. This document covers all federal programs.
- If the private school chooses to participate in Title I, Part A, begin discussing these services using the [Title I, Part A Record of Agreed Upon Services](#), as a guide for discussion.
 - **NOTE:** The Title I, Part A Record of Agreed Upon Services may be completed and finalized at a subsequent consultation.

***ESEA requires both documents to be completed and submitted to OSPI.**

Consultation Documentation

During the initial Consultation, private schools should affirm that:

District explained if there is a transfer of funds from one federal program to another.
(More on Transferability to come.)

An initial program of equitable services was designed.

Timely and Meaningful consultation occurred.

Complaint procedures were explained.

Late Summer/Early Fall On-going Consultation

Additional Topics for Discussion

Size and scope of equitable services the district will provide.

How much funding is available to serve private school students, teachers, families and educational personnel.

Identification of students and their needs, 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.

Ongoing Consultation Process



Working Together

Once decisions regarding services are agreed upon through consultation, decisions regarding when and how the district will monitor the services being provided need to be decided.



Structured Support/Ongoing Monitoring & Evaluation

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





More on 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 level of achievement of current year's program-did the services result in the agreed upon and expected outcomes?



One last topic for Consultation

Discussing Transferability

- ESEA section 5103(e)(2), requires districts to 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, principals, and other school leaders.
 - ✓ Title IV, Part A-School-level services that support a well-rounded education, improved conditions for student learning, and improved use of instructional technology.

Title I Guidance

Out-of-District Services Interlocal Agreements



Out-of-District Guidance for Title I, Part A Services

Title I, Part A requires districts to provide equitable services to eligible students that attend a private school outside the district's boundaries, but that reside in a Title I served attendance area in the district's boundaries.

Districts must contact these out-of-district private schools to determine if there are eligible students. Communication strategies with private schools outside a district's boundaries may vary and districts are encouraged to work with the private schools and the "home" districts of the outside private schools.

- After the Private Participation in Federal Programs application closes in April, OSPI sends the list of private schools outside the district's boundaries that may have eligible students.
- Use this list to determine which private schools to contact.
- Work with the private school to identify Title I, Part A eligible students.

NOTE: You can use the "out-of-district" report in the EDS application to generate your own report but remember to check the final report sent out by Julie Chace and posted to the webpage as it will contain the most up-to-date data.

Out-of-District Guidance Interlocal Agreements

- 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.](#)
- Determining who and how the services are provided is based on the agreement between the districts and the private school. When a district provides services on behalf of another district, an interlocal agreement outlining the period of performance, program requirements including services, funding, payments, reporting, and records maintenance is established

Interlocal agreements are **not** required. This is a district-by-district decision.



What if we can't agree and need assistance?

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:
sheila.gerrish@k12.wa.us

Complaint Procedures

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





Private School Yearly Approval/Renewal Process Washington State Board of Education

Private School Annual Approval Washington State Board of Education (SBE)

Reminder! The private school annual approval/renewal process is completed through the SBE and not the same as the Private Participation in Federal Program application.

For questions regarding the annual approval process for private schools, contact SBE at 360-725-6433, or Privateschools@k12.wa.us.

Private School Annual Approval

SBE-Change of Private School Information

Private Schools can 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.

Important to Remember for Title I, Part A

❖ For Title I, Part A Funding for services is generated by...

- Identify private school students who reside in a Title I-served public school attendance area.
- Of those students, identify the number of students whose families meet the low-income criteria.
- Students who meet both criteria **generate** funding for Title I services.

❖ Who receives services?

- Services can be provided to all students who reside in the Title I public school attendance area and are failing, or most at risk of failing to meet the state's academic achievement standards.
- Students **do not need to meet the low-income criteria** to receive Title I, Part A services.



Federal Program Contacts, Webpages, Additional Resources

Federal Program Webpages and Contact Information

ESEA Federal Program Information and Description of Private School Equitable Services

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	ellen.zito@k12.wa.us	360-972-0974
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](#)
- [Title VIII Non-Regulatory Guidance](#) (all other covered federal funding programs)
- [State Board of Education Private Schools webpage](#)
- [Allowable uses for Title II, Part A funds](#)
- [Title IV, Part A Program Coordinator guide, includes information on Equitable Services](#)



Equitable Services to Private Schools

Additional Resources

Weekly opportunity for districts and private schools to ask questions and receive assistance:
2025–26 EGMS Office Hours

- Open to all
- Drop in format
- No registration is needed

Tuesday EGMS Office Hour: 11 am–noon | Zoom Link:
<https://zoom.us/j/88033044818>

Thursday EGMS Office Hour: 1–2 pm | Zoom Link:
<https://zoom.us/j/82230019925>

If you have further questions or would like to provide any feedback regarding today's webinar, please email us.



For ESEA and programmatic questions, Sheila Gerrish,
sheila.gerrish@k12.wa.us

For technical assistance, Julie Chace,
julie.chace@k12.wa.us

Thank you for joining us today!