The Elementary and Secondary Education Act (ESEA) provides benefits to private school students, teachers and other education personnel, including those in religiously affiliated schools. These services are considered to be assistance to students and teachers and not to private schools. The reauthorized ESEA requires the equitable participation of private school students, teachers and other education personnel in some of its major programs.

**What does *equitable participation* by private school students and teachers mean?**

The participation of private school students, teachers and other education personnel in the ESEA programs providing services to this population is governed by the Uniform Provisions in Title IX of ESEA, sections 9501-9504. Five of these programs contain their own provisions for the equitable participation of private school students and teachers, which differ, in some respects, from the Uniform Provisions. These include:

* Title I, Part A, Improving Basic Programs, to provide supplementary instruction to students who are failing or most at risk of failing to meet your school’s core academic curriculum;
* Title I, Part C, Migrant Education, to provide supplementary educational and support services to migrant students through both regular school year and summer programs;
* Title II, Part A, Teacher and Principal Training and Recruiting, to help support sustained and intensive professional development;
* Title III, Limited English Proficient, to provide instruction and professional development that help limited English proficient students in the speedy acquisition of English language proficiency to achieve in the core academic subjects; and
* Title IV, Part A, Student Support and Academic Enrichment Grants, to provide students with a well-rounded education, support safe and healthy students, and support the effective use of technology.

Under the Uniform Provisions, local education agencies (LEAs) or other entities receiving federal financial assistance are required to provide services to eligible private school children, teachers and other personnel consistent with the number of eligible children enrolled in private elementary and secondary schools in the LEA, or in the geographic area served by another entity receiving federal financial assistance. These services and other benefits must be comparable to the services and other benefits provided to public school children and teachers participating in the program and they must be provided in a timely manner.

To ensure equitable participation, the LEA or other entity receiving federal financial assistance must assess, address and evaluate the needs of private school students and teachers; spend an equal amount of funds per student to provide services; provide private school students and teachers with an opportunity to participate in activities equivalent to the opportunity provided public school students and teachers; and offer services that are secular, neutral and non-ideological.

**The Kent ISD Consortium**

To improve upon the efficiency of the process in which Local Education Agencies provide services to eligible students, Kent Intermediate School District has developed this pilot program. The Kent ISD Private School Consortium include any of the 20 LEAs that choose to participate, as well as all of the Private Schools in Kent County. The main components of the program follow:

**Component 1: Identification of Eligible Students**

Traditionally, LEAs are required to send out a participation letter to every Private School within a 25 mile radius. The LEAs then meet with each of the Private Schools to determine if there are any eligible students from that district in the Private School and develop a plan of services with those schools.

With the consortium, Kent ISD will send out participation letters to each of the Private Schools within Kent County asking them to confirm participation in Title I, II, III, and IV programs. The Private School will then send the poverty count for Title I and Title IV using the Free/Reduced lunch form and complete a needs assessment that describes the academic deficits of students qualifying for Title I. The Private Schools will also send enrollment numbers for Title II, A programming. Kent ISD will facilitate the management of the contacts, as well as the list of participants for the LEAs. From the enrollment list and the help of the Private Schools, Kent ISD will identify the districts in which the students reside. This list will be sent to the LEAs.

The LEAs will determine the amount of funds generated for instruction using the appropriate MDE worksheet.

**Component 2: Joint Planning/Consultation**

Through individual meetings with the Private Schools, LEAs consult with a Private School designee to provide an explanation of the available federal programs and to develop a format for a comprehensive needs assessment and a school improvement plan. Once the Private School has the proper documentation, representatives meet to determine the services available to eligible students.

In the Kent ISD program, a countywide meeting will be held on March 28, 2017 with Private School and LEA representatives in attendance. Common documents will be used for all Private Schools and local districts in order to streamline the process. LEAs and Private Schools will be able to meet on the day of the Kent ISD meeting to determine services for eligible students. An LEA representative must be present at this meeting to meet with other LEAs and Private School representatives.

**Component 3: Services to Eligible Students**

The Kent ISD Consortium allows the appropriate services to be provided to eligible students in Private Schools. Previously, each LEA purchased the services for each Private School. The allocation per student and comprehensive needs assessment determined which services would be available to students.

In this consortium, the district in which the Private School resides will be responsible for purchasing services for all eligible students within that school, regardless of their home districts. The district will then bill the district in which the eligible student resides for the services provided. The district in which the Private School is located will also be responsible for monitoring how the funding is being spent, as well as for monitoring services. For maximum efficiency, the LEAs must meet prior to the implementation of services to agree upon the selection of services, as well as the allocation per pupil, which is documented in a memorandum of understanding, or MOU.

**Private School Consortium Timeline**

**School Year 2017-2018**

|  |  |
| --- | --- |
| January 30, 2017 | Kent ISD will send a letter to all LEA Superintendents about participation in the consortium. |
| February 13, 2017 | LEA confirmation of participation due to Kent ISD. |
| February 7, 2017 | Kent ISD will send out a letter to all Private Schools in the area offering them the option of participating in Title I, II, III and IV; and informing them of the required documentation if they select ‘yes’: Confirmation of poverty count for Title I using the Free and Reduced Lunch form and the completion of a needs assessment that describes the academic deficits of students qualifying for Title I. |
| February 24, 2017 | Private School intent to participate due to Kent ISD |
| February 28, 2017 | Kent ISD sends out 1st Notice of Participation/Information to Private Schools who have not returned a participation letter or the required information. |
| March 15, 2017 | Private School list of addresses of all students, with total enrollment, district enrollment, and EL/Immigrant status identified due to Kent ISD. |
| March 15, 2017 | Kent ISD sends out 2nd Notice of Participation/Information to Private Schools who have not returned a participation letter or the required information. Kent ISD will notify the LEA of the notified schools. |
| March 20, 2017 | Kent ISD will match addresses of private school students from low-income families (check Free and Reduced Lunch forms) to participating public school attendance areas. Kent ISD send the list to the LEAs via a Google document.LEAs estimate the amount of funds generated for instruction using the same estimated per-pupil amount as that used for public school students in participating public school attendance areas. Send this information to Laura Otten at Kent ISD. |
| March 28, 2017 | LEAs meet with each other to discuss student rosters, services, and allocations. Kent ISD facilitates meeting with Private Schools. Each LEA will have at least one representative present to speak with other LEAs and Private Schools.*LEAs meet with Private Schools to:* * Discuss poverty data collected, amount of estimated instructional funds generated, and determine funding for Title I.
* Discuss with private school officials the needs of selected students, appropriate Title I services to serve those needs, and location of services. Include the other available funds (Title IIA, Title IID, Safe and Drug Free Schools) in this discussion.
* Tell how much money is available, review the PNP needs assessment and discuss a plan together for all funding sources.
* Design services that meet participants’ needs based on consultation, using the estimated amount of funds generated by private school students from low-income families, the equitable share of funds reserved for district wide instructional activities and the other grant funding sources.
* Determine the standards and annual assessments for measuring progress of the Title I program and the evaluation to include in the plan.
 |
| May 1, 2017 | Private School plans due to LEAs |

Please select complete the following form and return it to Laura Otten, Kent ISD, in the enclosed envelope by February 13, 2017.

\_\_\_\_\_ Our district agrees to participate in the Kent ISD Private School Consortium for the 2017-2018 school year. By agreeing to participate, the district will make the appropriate information available to the ISD and adhere to the provided timelines.

\_\_\_\_\_ Our district is choosing not to participate at this time.

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Superintendent or Designee Date

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District Name

Contact information of the district representative attending the collaboration meeting on

March 28, 2017 at 9:00AM.

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Name Email