

# Nonpublic Quarterly Skype Monday February 24, 2020

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# Equitable Services Ombudsman

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Required under ESEA sections 1117(a)(3)(B) and 8501(a)(3)(B)

- Lynn Calvello [lcalvello@pa.gov](mailto:lcalvello@pa.gov)
- Melanie Salonick [msalonick@pa.gov](mailto:msalonick@pa.gov)

Point of contact between PDE, nonpublic school officials and LEAs  
Responds to and resolves any complaints regarding equitable services

Develops monitoring protocols under Title programs requiring equitable services

Monitors to enforce equitable service requirements under Titles I and VIII programs.

# Statewide Consultation Meetings

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West- Sheraton Station Square,  
Pittsburgh Wednesday March 4,  
2020

Central- PaTTAN Harrisburg  
Wednesday March 11, 2020

East- PaTTAN Malvern Wednesday  
March 18, 2020

PAFPC May 2020

LEA and nonpublic officials  
encouraged to attend

Register on PAFPC website

Sessions will provide an overview  
of nonpublic requirements

Technical assistance

Sample forms and templates

Review of the following programs:

- Title I, Part A
- Title II
- Title III
- Title IV

# Statewide Consultation Meetings

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## Agenda

- 8:30 a.m. - 9:00 a.m. Registration
- 9:00 a.m. - 9:15 a.m. Welcome & Introductions
- 9:15 a.m. - 10:15 a.m. Equitable Services/Nonpublic Program Overview
- 10:15 a.m. - 10:30 a.m. Break
- 10:30 a.m. - 11:00 a.m. Non-public Perspective / Q&A
- 11:00 a.m. - 11:45 a.m. Meaningful Consultation - LEA and Nonpublic representatives
- 11:45 a.m. - 12:00 p.m. Wrap up

# Consultation

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LEA must provide consultation

**Goal:** Provide equitable and effective programs *agreed upon* by the LEA and non-public schools

**Timely:** Prior to making any decisions that effect non-public programs

**Meaningful:** Genuine opportunity for parties to express their views (34 CFR 76.652)

- All views taken into consideration

# Consultation

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NP Officials – Provide:

- Economically disadvantaged student addresses and grade level;
- Lists of names, addresses, and grade levels of children who may meet the educationally related, objective criteria for participation eligibility;
- Ideas, program designs including needs assessment, and modifications that meet the needs of their eligible children, their teachers, and their families;
- A dedicated space for the provision of Title services, if applicable.

# Consultation

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Consultation Topics (ESEA Section 1117(b)(1))

- listed on Affirmation of Consultation form\*

Final decision is made by the LEA after consultation.

If an LEA disagrees with the non-public school officials with respect to any topic subject to consultation;

- The LEA must provide in writing to non-public school officials the reasons the LEA disagrees. (ESEA Section 1117(b)(2))

Results following consultation must be transmitted to the Ombudsman. (ESEA Section 1117(b)(1) and 8501(c)(1), (5))

# Transferability Authority and Equitable Participation

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Transfer of funds is part of the non-public consultation.

Title V of ESSA authorizes an LEA to transfer up to 100% of Title IIA or Title IV into Title IA, IIA or IV Part A.

- LEAs may NOT transfer out of Title I A or Title III.

Non-public schools may receive services to the extent that funds remain in the grant program after transfer.

- Non-public equitable share is calculated post transfer based on the amount remaining in programs.

Decisions are made by the LEA must be discussed with the non-public schools during consultation.



# Nonpublic Title I Part A Guidance Updated October 2019

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In response to public comment USDE Office of Nonpublic Education addressed relevant issues by adding additional questions, revising language for clarity, and providing specific examples to illustrate complex provisions.

## Pooling of Title I Funds

- The guidance reflects the Department's decision that inter-district pooling is lawful and allowable as pooling across districts does not change the total amount of funds generated for Title I equitable services for any area in which pooling across LEAs would occur.\*

## Religiously-Affiliated Third-Party Providers

- The guidance addresses the permissibility of religious organizations to serve as third-party contractors to provide equitable services.

# Trainings/Conferences

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Spring Federal Program Coordinator Training – May

2020-21 Federal Program Coordinator Sessions will be held in September, February & May

- Register at [www.pafpc.org](http://www.pafpc.org)

May 3 – 6, 2020 - Annual Pennsylvania Association of Federal Program Coordinators Conference (PAFPC), Seven Springs, PA

July 7 – 9, 2020 - Title I State Parent Advisory Council (SPAC) Conference, Seven Springs



QUESTIONS

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