



Equitable Services for Private Schools



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Every Student Succeeds Act (ESSA)

Section 1117(a)(3)

Local Education Agencies (LEA) receiving federal entitlement funds are obligated to identify and serve eligible at-risk students who reside within their Title I attendance areas and attend private schools. Services provided to private school students must be equitable to those provided to public school students.

Timeline for Consultation & Grant Funding

January

- Balsz School District will research and identify private schools located within the Balsz School District attendance areas.
- Private schools outside of Balsz School District attendance areas that have students who live in a Balsz School District Title I school attendance area, may contact Balsz School District to consult for Title I services for eligible students.

February

- Intent to Participate Letters will be sent to identified private schools to notify them of their right to consult with Balsz School District for equitable services (Title I, Title II, Title III, and Title IV).
- Private Schools complete and submit Notification of Intent to Balsz School District.
 - Balsz School District will make 3 good faith attempts to contact private schools, with the last attempt being a certified letter, if the private school does not respond it is understood that they will not be participating for that year.
- Provide forms and suggested criteria for counting eligible students. (Identifying and sharing with Balsz School District the list of eligible students is the private school's responsibility).
- Private school submits Student List per Indicator 1 & 2 to Balsz School District. Submit to Balsz School District a spreadsheet that includes (student name, grade, address, Balsz School District eligible home school within Title I boundaries).
- Private schools must maintain supporting documentation related to student poverty data. Balsz School District will verify when on site.
- Inform private school officials of their right to appeal to the state education agency if they feel their requests are not adequately considered.



March

- Balsz School District will provide private schools with their preliminary allocation, to include a Yearlong Planning Spreadsheet.

April

- **April 15th** Deadline for private schools to email Balsz School District their Preliminary Yearlong Planning Spreadsheet which outlines how they would like to budget their equitable share, so it may be included in the initial grant submission which is due May 1st to ADE. **After April 16th please contact the Balsz School District Department of Federal & State Programs for more information regarding services for the following school year.**

June/July

- Private school will communicate with Balsz School District which third party service provider they would like to utilize for student services
- Work with third party service provider to develop a Service Delivery Plan
- Determine student service start date.

August/September

- Consultation will take place between the private school and Balsz School District to confirm services and sign the Affirmation of Consultation
- Private School to submit updated Title I Eligible Student Service Roster.
- Begin Title I equitable services; no student may receive services without first being verified by Balsz School District

September/June

- LEA will monitor the program during the school year through communication with participating staff.
- LEA will work directly with third party vendors to confirm services are being provided as agreed upon in the Service Delivery Plan.

Ongoing Consultations

- Consultation meetings may be scheduled by either party any time throughout the year
- Balsz School District will check in regularly regarding needs, budget reconciliation, purchase orders, invoicing, etc. (see timeline)



Title I-A

Consultation

Each year, Balsz School District is obligated to reach out to all private schools in the attendance areas of Balsz School District. An invitation to consult with Balsz School District will be sent to every identified private school in the spring semester. (See timeline above.) The private school leadership can elect to accept or decline the invitation to consult for equitable services. If the private school does not respond to our invitation to consult, Balsz School District will make three good faith attempts to communicate with the private school. If no response is received, that private school will not be included in that year's grant application. Those private schools that elect to participate in the consultation, will begin meeting with Balsz School District grant officials to establish the services to be provided.

Private schools that are located outside of the Balsz School District attendance area and have eligible students that reside in a Balsz School District Title I school attendance area, may also elect to consult with Balsz School District. The responsibility of Balsz School District is to contact private schools outside the district if Balsz School District has reason to believe students who reside in a Balsz School District Title I school attendance area attend those private schools. Additionally, if a private school has students it believes may be eligible for Title I services, private school officials may contact Balsz School District directly. They must contact Balsz School District by March 15th to be included in that year's services. (ESEA section 1117(b)(1))

Identifying Eligible Students

Step One - Collection of Private Schools' Poverty Data

Balsz School District must determine the number of private school students from low-income families, residing in Balsz School District Title I school attendance areas. All low-income students attending private schools need to be mapped back to the Balsz school they would attend if going to Balsz School District.

During the month of February, Balsz School District collects student names, addresses and grade level for students meeting poverty criteria. Confidentiality is of utmost importance. Forms for the collection of information on free and reduced lunch income/household size guidelines from the AZ State Department of Education, both in English and Spanish, are provided to the private school officials. This information provides



suggested methods to determine poverty data: survey with extrapolation; comparable data, such as a home survey; and proportionality.

[Free & Reduced Guidelines \(English\)](#)

[Free & Reduced Guidelines \(Spanish\)](#)

Step Two - Determining At-Risk Status

There are two criteria for students to receive equitable services. First, they must reside in a Balsz School District Title I school attendance area. Second, the student must be identified at-risk of failing to meet the academic standards used to define proficiency by the private school. Balsz School District will work with the private school officials to identify multiple academic criteria that will be used to select students at-risk. Poverty alone is **not** a reason to select a student; however, homelessness, two preceding years in Head Start, Even Start, Early Reading First, Title I Preschool or Migrant Education are reasons. Title I Eligible Student Service Roster may be updated during the school year to include new students and/or students falling below proficiency.

LEA Contracted Independent Third-Party Vendor

Third-party vendors may be used to provide equitable services. The number of eligible students and the per pupil allocation will determine the total amount of funds available for third party vendors for each private school. Invoices must include the names of the students who received services.

An LEA may not contract out its consultation obligations. An LEA that has contracted with a third-party provider to deliver Title I services to private school students retains responsibility for overseeing the program, measuring the program's effectiveness, authorizing the expenditure of all federal funds, and ensuring the program is secular, neutral, and non-ideological. A third-party provider must be independent of the private school and unaffiliated with any religious organization.

Title II-A

Balsz School District is obligated to reach out to all private schools in the attendance areas of Balsz School District yearly to discuss equitable Title II-A services. An invitation to consult with Balsz School District will be sent to every identified private school in the spring semester. (See timeline above.) The private school leadership can elect to accept



or decline the invitation to consult for equitable services. If the private school does not respond to our invitation to consult, Balsz School District will make three good faith attempts to communicate with the private school. If no response is received, that private school will not be included in that year's grant application. Those private schools that elect to participate in the consultation, will begin meeting with Balsz School District grant officials to establish the services to be provided. The services are not pre-determined and the goal of consultation is to reach agreement on how to provide equitable services.

Title III-A

Consultation

Contact Balsz School District EL Coordinator.

Identifying English Learner Students in Private Schools

The Arizona Department of Education recommends that private schools establish an agreement with the LEA to use procedures parallel to those used by public schools. The process is as follows:

- A [home language survey](#) and an enrollment form should be completed by the parents of private school students. Private schools should use the same home language survey as that used in the LEA.
- If an answer on either the enrollment form or the home language survey is something other than English, an English language assessment should be administered to determine the proficiency level of the student. Private schools do not have access to the AZELLA, therefore; the LEA must provide the testing materials.

Title IV-A

Balsz School District is obligated to reach out to all private schools in the attendance areas of Balsz School District yearly to discuss equitable Title IV-A services. An invitation to consult with Balsz School District will be sent to every identified private school in the spring semester. (See timeline above.) The private school leadership can elect to accept or decline the invitation to consult for equitable services. If the private school does not respond to our invitation to consult, Balsz School District will make three good faith attempts to communicate with the private school. If no response is received, that private school will not be included in that year's grant application. Those private schools that elect to participate in the consultation, will begin meeting with Balsz School District grant officials to establish the services to be provided.



Plans, Budgets, and Revisions

- Private schools will provide budget narratives as they are written in each grant
- Standard revisions are typically after final allocations, after the new year and at the end of the school year
- Revisions to plans must occur prior to anything being procured on behalf of any private school
- Balsz School District will contact private schools regarding any planned or unplanned revisions to discuss possible changes to needs and/or plans

Procurement

- Purchase orders take an average of two weeks once a requisition is entered
- It is the responsibility of the private school to provide quotes, shopping cart, scope of work, etc. to the LEA at least a three-week before the purchase is needed.
- It is the responsibility of the private school to provide the necessary paperwork required to create a requisition on behalf of the private school
 - Service request via email that includes all details about the purchase
 - Quote
 - W-9 and Vendor form
 - Scope of Work for coaching/consulting
 - Conference: Conference name, location, date, brochure/itinerary, first and last name of each attendee, job title of each attendee
- Invoices will be sent to the private school official and must be signed by the private school official to verify accuracy
- Verified invoices will be sent to the Federal and State Programs Manager to be processed
- Payments are run every other week
- Private school officials are responsible for ensuring Balsz School District is invoiced for services provided immediately following services
- Ongoing services with open POs must be invoiced monthly

Travel

- Travel must be approved in the grant prior to receiving a purchase order on behalf of the private school [Participant Support Cost Per Attendee](#)
- Conference Requests must be received from the private school at least one month prior to the date registration must be paid



- It is the responsibility of the private school to provide the necessary paperwork required to create a requisition on behalf of the private school
 - Onsite PD/coaching/consulting – quote
 - Scope of Work for coaching/consulting
 - Conference: Conference name, location, date, brochure/itinerary, first and last name of each attendee, job title of each attendee
- Attendees will be reimbursed post travel for meals and incidentals and may not exceed the maximum allowed rates set forth by the state of Arizona - [State of AZ Accounting Manual - Maximum Reimbursement Rates](#)
- **The private school may not be reimbursed directly for any expenses**
- Travel will be booked by Balsz School District and will include a \$50.00 increase to allow of fluctuation in costs; any changes will be adjusted post conference/travel; the following information must be sent for air travel requests; preferences will be considered, however the lowest fare will be selected
 - Preferred travel days/times
 - First and last name of traveler as it appears on their driver's license
 - Birthdate of the traveler
- The following documentation is required for reimbursement
 - LEA Reimbursement Request per traveler
 - Original receipts must be submitted
 - Documentation must be received no later than two weeks post travel
- Traveler cancels after registration and airfare has been paid
 - Registration only – private school should work with vendor to substitute attendee if allowed; if not, request a refund; if neither is an option, the funds will remain as expended using the private schools equitable share
 - Airfare – airfare is not transferable or refundable; therefore, the attendee or private school must reimburse the grant for funds used to purchase airfare; based on the airline's cancellation policy, if allowable, the ticket will remain in the traveler's name for travel at their or the school's discretion by the expiration date
 - Balsz School District only funds travel from and to Phoenix, Arizona.

Carryover

Funds for equitable services should be obligated in the school year for which they were appropriated. The funds set aside to provide equitable services may be carried over when circumstance has prevented the obligation of funds.



- Title I: If funds remain at the end of the year because services for a particular private school were delayed or cost less than expected, Title I funds carried over to the next fiscal year remain designated for equitable services for the private school students from the original school for which they were reserved. If the original private school declines these services or if carryover results from closing of a private school, these funds should be used in the subsequent year for any other participating private school, and then, if funds cannot be used for participating private schools, they revert to the district Title I-A program.
- Title II or IV: If services were delayed for original private schools, funds should be carried over and used for the school for which they were originally reserved. If carryover is not due to the district's delay or circumstance (i.e. private school closing, services cost less than estimated), carryover funds may revert to the district.

Carryover Determination

- If funds were not obligated due to LEA negligence or circumstance, the original private school will be awarded all unexpended funds.
- If funds were not obligated due to private school negligence or circumstance, the original private school will be awarded up to 15% of the unexpended funds.
- All funds, carryover and allocation must be able to be expended within the school year.

Dispute Process

Private school officials have the right to file a complaint with the Arizona Department of Education if they believe Balsz School District officials have not complied with appropriate legal requirements related to the *Elementary and Secondary Education Act*. As part of the complaint, the private school official must inform ADE with the basis of Balsz School District's noncompliance. ADE state ombudsman will investigate and will provide a written resolution to the complaint filed under ESSA within 45 days of receiving it.

Arizona Department of Education

[ADE web page for Private Schools and Title I](#)

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)