Pequea Valley School District
Procedures for Non-Public Schools

Federal regulations require Local Education Agencies (LEAs), to set aside an equitable share of federal subgrants received through the Commonwealth of Pennsylvania. These funds—which include Title I Part A, Title II Part A, Title III, and Title IV under the Every Student Succeeds Act (ESSA), as well as IDEA Part B—are intended to provide services and programs for eligible students, parents, and staff within non-public schools. The will ensure these individuals will receive federally funded educational opportunities the same way their public school partners do.

Federal law stipulates that these funds cannot go directly to non-public schools. Instead, Pequea Valley will retain full administrative responsibility and oversight of the money, ensuring all expenditures follow federal guidelines and grant management procedures. The district is required to engage in a formal consultation process with non-public schools to determine how services will be delivered and reviewed. This document serves as a guide to outline these roles, explain the methodology for calculating equitable shares, and establish a clear timeline for these activities throughout the school year.

Consultation
The following is derived from federal guidance regarding the scope and tenor of consultation and the collaborative relationship it is intended to embody.

Roles and Relationships
Federal guidance indicates that: "Consultation involves discussions between public and private school officials on key issues that affect the ability of eligible private school students to participate equitably in Title I programs."

Effective Consultation
- Provides genuine opportunities for all parties to express their views and to have those views considered.
- Fosters positive and productive working relationships; begins with and is guided by an assessment of the needs of eligible students, parents, and educational staff.
- Results in appropriate services that meet the needs of eligible students.

Regulatory requirements of consultation include:
- How the needs of eligible private school children will be identified.
- What services will be offered to eligible private school children and when, including the time of day the services will be provided.
- How and when the LEA will make decisions about the delivery of services.
- How, where, and by whom the services will be provided to eligible private school children.
- How the services will be academically assessed and how the results will be used to improve services.
- The services the LEA will provide to teachers and families of participating private school children.
- The size and scope of the equitable services the LEA will provide to the eligible private school children and the proportion of funds allocated for such services.

- The method or source of data the LEA will use to determine the number of private school children from low-income families residing in participating public school attendance areas.
- Discussion of service delivery mechanisms the LEA will use to provide service and whether the LEA will provide services directly or through a separate government agency, consortium, entity, or third-party contractor.
- Whether to provide equitable services to eligible students by combining the funds generated into one or more pools of funds based on all the children from low-income families in a participating school attendance area who attend private schools.
- The LEA must obtain written affirmation from the private school official that consultation has taken place and the affirmation document must provide an opportunity for the private school official to indicate that adequate consultation has not occurred.

Third-Party Service Provider Contracts
For services rendered through third-party service provider contracts (IU 13, CCIU, STS), a LEA must include for consideration in the procurement process:

- Population to be served.
- When supplemental services will be provided.
- Duration of supplemental services.
- Evaluation defined by LEA.
- Alignment with private school curriculum and programs & how the program will support what is already in place in the classroom.
- List of required deliverables.
- How the vendor will coordinate with non-public school staff and with what frequency.
- For services rendered through third-party service provider contracts an LEA must follow procurement processes compliant with federal regulations and cost principles set forth in the federal Uniform Grant Guidance (UGG) as well as the LEA's policies and procedures on grants management and compliance, including competitive procurement processes.

Compliance and Timing
Planning and lead time for procuring goods and services and for approving expenditures are a necessity given the nature of requirements of federal cost principles. All procurements and expenditures must be compliant with the Peque Valley School District's policies and procedures on federal grant management and compliance, including, but not limited to: travel, meals, competitive procurement and contracting, supplemental pay, and other non-payroll expenditures. Consultation is an on-going process. It occurs most intensively during the planning period in advance of the start of a new fiscal and school year, and it occurs throughout the year to improve service delivery consistent with the scope of the agreed plan.

Equitable Share Funding and Calculation Methodology
The primary purpose of Title I funds for Pequea Valley School District is:

- to close the achievement gap, particularly for academically disadvantaged children; and
- to ensure that children have a fair, equal, and significant opportunity to obtain a high-quality education and reach State academic standards.

Under ESSA, once the Pequea Valley School District receives its Title I allocation from the Pennsylvania Department of Education (PDE), the percentage of identified low-income students attending non-public schools is used to determine the Title I funds designated as Equitable Share.

Egrants automatically calculates funding for each non-public school based on the number of eligible students submitted. This data is shared with the non-public school and the Intermediate Unit (IU) responsible for providing Title I services. To identify poverty-eligible students, schools may use paper surveys, National School Lunch Program (NSLP) participation data, or the Community Eligibility Program (CEP) multiplier (established by the U.S. Department of Agriculture).

From the Non-Public Equitable Share allocation, if the total Title I funding meets or exceeds $500,000, at least 1% must be dedicated to Parental Involvement and Family Engagement activities. Additionally, administrative costs for Non-Public programs must be deducted before determining the final Equitable Share available for student services.

Service Delivery / Monitoring / Continued Consultation

The Pequea Valley School District maintains administrative control over Title I services provided to non-public schools. This involves monitoring all aspects of the federal program as delivered by contracted third-party providers, such as IU 13. Throughout the year, Pequea Valley School District will engage in formal and informal consultation with non-public school administrators. Informal consultation includes school visits, emails, and phone calls, occurring whenever program information is shared between the district and non-public administrators.

Scope of Equitable Share Services by Funding Source

Title I, Part A Services

Title I, as amended by the Every Student Succeeds Act (ESSA), provides federal financial assistance to Local Educational Agencies (LEAs) to ensure all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at minimum, proficiency on challenging academic standards.
Accordingly, Title I requires each participating LEA to provide services to eligible non-public school students that are equitable to those provided to public school students. The target population consists of non-public school children identified as failing, or most at risk of failing, to meet the challenging academic achievement standards adopted by the student's non-public school. Funds are allocated to non-public schools specifically for instructional support and parental involvement activities.

Title II, Part A Services

Title II, Part A funds are designated for non-public school teachers, principals, and other eligible educational personnel. These funds support participation in professional development activities designed to improve educator quality and increase student achievement.
Professional development activities can include:

- Improving educator knowledge in core academic subjects and effective instructional strategies.
- Training on the effective integration of technology into curricula and instruction.
- Instruction on teaching students with diverse needs, including students with disabilities, English learners, and gifted and talented students.
- Training in behavior management, identifying early interventions, and increasing effective parental involvement.
- Leadership development and management training for principals and superintendents.
- Training in the use of data and assessments to improve instructional outcomes.

Points of Clarification:

- Conferences: Title II, Part A funds may pay for a non-public teacher's attendance at a professional conference, provided the event is part of a sustained, comprehensive, and secular professional development plan.

- Substitutes: Funds may not be used to pay for substitute teachers to replace non-public school staff attending professional development.
- Supplement vs. Supplant: If a non-public school already mandates a specific amount of professional development Title II, Part A funds must be used for activities that go above and beyond that existing requirement.

Title III Services
Title III funds provide supplemental services to ensure that Limited English Proficient (LEP) students, including immigrant children, develop English proficiency and meet the same rigorous academic standards as their peers. Title III funds may also be used to provide staff with professional development focused on effective educational strategies for English learners.

Title IV Services
Title IV funding consolidates various existing federal grants into a single award to the LEA. Title IV funds are used for three primary purposes: 1) to provide students with a well-rounded education; 2) to support safe and healthy students; and 3) to support the effective use of technology. Title IV is subject to Equitable Share to non-public schools.

IDEA, Part B Services
IDEA Part B funds provide supplemental special educational services for students with disabilities. IDEA is a comprehensive piece of legislation that identifies the criteria under which students might become eligible for services and spells out the types of services they might be eligible to receive. Generally, the services are designed to remove barriers commonly faced by individuals with disabilities in accessing full participation in educational programs. The law stipulates that students with disabilities should be evaluated by experts in education and disability and that the students, along with their parents/guardians, should be participants in devising their own educational goals and plans. The supplemental services provided should be aligned to those jointly developed plans and designed to help students achieve their educational goals. Provisions within IDEA pertaining to the equitable participation of students enrolled (by their parents) in non-public schools require LEAs to:

- Reach out to non-public schools to solicit input in the process of identifying students with disabilities ("Child Find");
- Provide individual assessments of identified students with disabilities enrolled in non-public schools; and
- Consult with non-public school representatives and parents of non-public school students with disabilities in planning and providing available appropriate services.

IDEA Part B equitable share funds may be used to provide supplemental special educational services such as Braille translation of instructional materials, certain types of assistive technology for learning, etc. IDEA Part B equitable funds may not be used for non-public school tuition or uniforms.

Timeline of Activities and Benchmarks
In Janurary the Pequea Valley Assistant Superintendent conducts on-site in-person mid-year consultation meetings for Title I, II and IV non-public participating schools. A Title II/IV stakeholder meeting including non-public representation also occurs.

In February, mailings are sent to nonpublic schools regarding Title I services for the upcoming school year. This mailing includes letters regarding the Title I program, and a participation response form.

Also in February mailings are sent to nonpublic schools within our district regarding Title II, Title III, and Title IV services. This mailing includes a letter regarding the services and a participation response form. The letter explains that if a response is not given to Pequea Valley by April 1st, then it will be assumed that these services have been declined by the nonpublic school. Nonpublic schools are asked to submit rosters of any students from the Pequea Valley School District and their criteria for determining low income status.

In April, correspondence mailings are sent to all the nonpublic schools who did not respond to the initial mailing regarding Title I services for the upcoming school year. This mailing includes letters regarding the Title I program, and a participation response form.

In June once the grant allocation has been released, affirmation forms are sent via email to the nonpublic schools who reported that they would like to participate in the Title I program for the following school year.

In March/April, the IU coordinates meetings with the current year participating Non-Public Schools, via Zoom. Pequea Valley Assistant Superintendent attends those meetings.

In June the egrant consolidated applications are completed by the Federal Programs Coordinator. An email is sent to notify Non-Public Schools of their allocation.

In August a beginning of the year Title I, II, IV stakeholder meeting occurs, including non-public school representation about services, performance goals, and eligible students.

July 1 the consolidated application for Title I, II, and IV.

August and beyond, party service providers consult with non-public schools about services and parent involvement to commence services.

Pequea Valley proactively continually consults with non-public schools in an informal way via email or calls to receive feedback on services and periodically review plan, making adjustments as necessary.

Communication/Complaint Procedures

The Pequea Valey School District strives to provide appropriate services for all students. If a concern about federal programming arises, we encourage that concerns be addressed directly through the District Federal Programs Coordinator. If the concern cannot be addressed at that level, formal complaint procedures are available on the district webpage or can be provided by the District Federal Programs Coordinator.