

# Equitable Services to Private Schools



## Private Nonprofit School Manual

*The purpose of this manual is to communicate the processes and procedures established to assist with meeting compliance requirements and maintaining ongoing communication & consultation between participating PNP schools and district representative(s).*

# Table of Contents

3	OVERVIEW OF FEDERAL PROGRAMS
5	EXPENDITURE GUIDELINES
8	CONSULTATION PROCESS
10	PURCHASING, TIMELINE, ROLES & RESPONSIBILITIES, COMMUNICATION

## APPENDICES

Appendix A	Funds Calculations (TI, TII, TIV)
Appendix B	Orientation Letter
Appendix C	Orientation Participation Form
Appendix D	Consultation Form (TI, TII, TIV)
Appendix E	Written Disagreement Rationale
Appendix F	Family Income Survey
Appendix G	Total Enrollment Form
Appendix H	Needs Assessment
Appendix I	Program Evaluation
Appendix J	Inventory Process
Appendix K	Timeline Overview
Appendix L	Roles and Responsibilities

## Overview of Federal Programs

**History:** Established in 1965, the *Elementary and Secondary Education Act (ESEA)*, reauthorized in 2002 to *No Child Left Behind Act (NCLB)*, then reauthorized again in 2015 to *Every Student Succeeds Act (ESSA)*, requires local education agencies (LEAs) to provide services for eligible private school students. *ESSA, SEC. 1117(3)(A)* explains that to the extent consistent with the number of eligible children who are enrolled in private elementary schools and secondary schools, an LEA shall be equitable in comparison to services and other benefits for public school children participating under this part and shall be provided in a timely manner.

### **Title I, Part A: Improving the Academic Achievement of the Disadvantaged**

The purpose of this program is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. *~ESSA, SEC. 1001*

**Qualification for Services:** Eligible private school children are children who reside in a participating Title I public school attendance area and are low achieving. *~TI Non-Regulatory Guidance, 2019 pg. 7* Preschool: LEA is not required to provide equitable services to preschool children in a private school and low-income preschool children do not generate funds for such services. *TI Non-Regulatory Guidance (2019)C-2, pg. 31, ESSA Funding Formulas Reference Manual (2018) pg. 4 & 5, ESSA, SEC. 1115(c)(1)(B)*

**Allocation Determination for Equitable Services:** The amount of Title I funds allocated to each participating public-school attendance area is determined mainly on the total number of low-income students residing in each area. Once the participating public-school attendance areas have been established, an LEA calculates the per-pupil allocation (PPA) for each participating public-school attendance area. Then, based on the total number of children from low-income families residing in each attendance area attending either public or private schools, the LEA calculates the total amount of funds for each area. From this amount, the LEA designates an amount of funds (equal to the PPA multiplied by the number of low-income private school students in the area) to provide equitable services to eligible private school participants. *~ESSA, SEC. 1117(c)(1)(A-D)*

### **Title I, Part C: Education of Migratory Children**

The purpose of this program is to design and support programs that help migrant students overcome the challenges of mobility, cultural and language barriers, social isolation, and other difficulties associated with migratory lifestyle in an effort to help migrant students succeed in school. *~TEA*

**Qualification for Services:** An LEA receiving assistance under Title I, Part C, must provide eligible private nonprofit school children and their teachers or other educational personnel, with equitable services or other benefits under this program. Before an LEA makes any decision that affects the opportunity of eligible private nonprofit school children, teachers, or other educational personnel to participate, the LEA must engage in timely and meaningful consultation with private school officials and maintain written documentation of such efforts. *~ESSA Provisions and Assurances pg. 29.*

**Allocation Determination for Equitable Services:** Direct services and support paid for with Title I, Part C funds are managed through ESC (Education Service Center) Region 12.

### **Title II, Part A: Preparing, Training, and Recruiting High-Quality Teachers, Principals, or Other School Leaders**

The purpose of this program is to provide grants to State educational agencies and subgrants to local educational agencies to— “(1) increase student achievement consistent with the challenging State academic standards; “(2) improve the quality and effectiveness of teachers, principals, and other school leaders; “(3) increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and “(4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders. *~ESSA, SEC. 2001*

**Qualification for Services:** LEAs are required to provide educational services and other benefits for private school children, teachers and other educational personnel, equitable in comparison to services and other benefits for public school children, teachers and other educational personnel. *~ESSA, SEC. 8501a(1)*

**Allocation Determination for Equitable Services:** The amount of Title II funds allocated to each participating private nonprofit school is based on the total amount of allocated Title II funds that the district receives divided by the district and PNP total of participating students enrolled. This generates a per pupil allocation amount which is multiplied by the total number of students enrolled at the private nonprofit school.

### **Title III, Part A: English Language Acquisition, Enhancement, and Academic Achievement Act**

The purpose of this program is to ensure that English Learners and Immigrant students attain English proficiency and develop high levels of academic achievement in English and to meet the challenging State academic standards. *~TEA*

**Qualification for Services:** Definition of English Learner *~USDE, TIX, General Provisions, SEC. 9101(25) & TIII, Non-Regulatory Guidance (2016), pg. 43*

1. An individual who was not born in the United States or whose native language is a language other than English;
2. who is a Native American or Alaska Native, or a native resident of the outlying areas; and
3. who comes from an environment where a language other than English has had a significant impact on the individual's level of English language proficiency; or
4. who is migratory, whose native language is a language other than English, and who comes from an environment where a language other than English is dominant; and whose difficulties in speaking, reading, writing, or understanding the English language may be sufficient to deny the individual —
  - the ability to meet the State's proficient level of achievement on State assessments described in *~ESSA, SEC. 1111(b)(3)*;
  - the ability to successfully achieve in classrooms where the language of instruction is English; or
  - the opportunity to participate fully in society.

**Allocation Determination for Equitable Services:** The amount of Title IV funds allocated to each participating private nonprofit school is based on the total amount of allocated Title IV funds that the district receives divided by the district and PNP total of participating students enrolled. This generates a per pupil allocation amount which is multiplied by the total number of students enrolled at the private nonprofit school.

### **Title IV, Part A: Student Support and Academic Enrichment**

The purpose of this program is to increase the capacity of state education agencies, local educational agencies (LEAs), campuses, and communities to meet the following three goals:

1. Provide all students access to a well-rounded education
2. Improve academic outcomes by maintaining safe and healthy students
3. Improve the use of technology to advance student academic achievement

**Qualification for Services:** LEAs are required to provide educational services and other benefits for private school children, teachers, and other educational personnel, equitable in comparison to services and other benefits for public school children, teachers, and other educational personnel. *~ESSA, SEC. 8501a(1)*

**Allocation Determination for Equitable Services:** The amount of Title IV funds allocated to each participating private nonprofit school is based on the total amount of allocated Title IV funds that the district receives divided by the district and PNP total of participating students enrolled. This generates a per pupil allocation amount which is multiplied by the total number of students enrolled at the private nonprofit school.

### **(Appendix A: Title 1, II, & IV Calculations)**

# Expenditure Guidelines

The control of funds provided under this part, and the title to materials, equipment, and property purchased with such funds, shall be in a public agency and a public agency shall administer such funds, materials, equipment, and property.

Federal funds are intended to benefit students in the current school year. Timelines are established during consultation to support effectiveness of program planning and intent. Funds are subject to redistribution if unspent by set deadline due dates.

**Title I Expenditures:** Title I funds are expended to implement academic *research-based* programs and to provide services to ensure that students have a fair, equal, and significant opportunity to improve their academic achievement. ~*TI Non-Regulatory Guidance (2019)C-36, pg. 38*

Title I program expenditures may include the following but are not limited to:

1. Tutoring Services to Eligible Students:

- Public or private school teachers that are highly qualified, according to Texas State standards, may be hired to teach at the private school outside of the regular school classroom. Services may be provided during the school day and before and after school as long as the teacher is not currently on a teaching contract during those times. \*\*The approximate time of day services shall be rendered must be determined before any services may begin. ~*ESSA, SEC. 1117 (b)(1)(K)*
- Title I services must be provided in a separate space outside of the regular classroom located at the PNP facility; if services are provided in a library or PNP classroom, the space must be separate or portioned off.
- The PNP school official may choose to contract services with potential third-party vendors.

2. Technology:

- Software Programs
- Computer Equipment
- Computers and software supplies purchased with federal funds may only be used by Title I eligible students.

3. Counseling/Mentoring

4. Materials:

- KISD maintains ownership of materials, equipment, and property purchased with federal funds.
- Materials, etc., purchased with federal funds may only be used by Title I eligible students.
- Each item purchased with Title I funds will be labeled with a KISD barcode. The labels should not be removed by the PNP.
- PNP may maintain materials, etc., at their facility if items are stored in a secured location. Tutor assumes responsibility of this material and/ or equipment when removed from the storage location maintained at the PNP facility.
- Materials and/or equipment stored at a district facility will be signed out to the PNP representative and/or KISD tutor. PNP representative and/or KISD tutor assumes responsibility of material and/or equipment until which time the material is returned to the district.

**Title I, Part C Expenditures:** To the extent consistent with the number of eligible children identified in the school district served by the LEA who are enrolled in private nonprofit (PNP) elementary and secondary schools, the LEA shall--~*TI, Pt C Migrant Education Program Guide (2022)pg.15*

After timely and meaningful consultation with appropriate private school officials, provide such children, on an equitable basis and individually or in combination, as requested by the officials to best meet the needs of such children...

1. instructional services (including evaluations to determine the progress being made in meeting such students' academic needs),
2. counseling,
3. mentoring,
4. one-on-one tutoring,
5. or other benefits (such as dual or concurrent enrollment, educational radio and television, computer equipment and materials, other technology, and mobile educational services and equipment) that address their needs; and
6. ensure that teachers and families of these children participate, on an equitable basis, in services and parent and family engagement activities.

**Title II Expenditures:** Educational services and other benefits allowable within this program shall be equitable in comparison to services and other benefits of public schools and shall be provided in a timely manner. *~ESSA, SEC. 8501(a)(3)(A)*

Title II program expenditures may include the following but are not limited to:

1. Professional Development (off-site): Opportunities to attend professional development training off-site (travel, hotel, registration)
2. Professional Development (on-site): Consultant(s) may provide instructional training on-site.
3. Professional Development (KISD): PNP instructional staff may attend professional development sessions offered through Killeen ISD.
4. Professional Development (Instructional Material/Resources): books, videos, on-line PD, access to educational training websites, instructional materials to develop content knowledge

**Title III Expenditures:** Educational services and other benefits allowable within this program shall be equitable in comparison to services and other benefits of public schools and shall be provided in a timely manner. *~ESSA, SEC. 8501(a)(3)(A)*

Title III program expenditures may include the following but are not limited to: *~PNP, FAQ (2017)(5.3)*

1. Tutoring services before, during, or after school hours.
2. PD for PNP school teachers of ELs.
3. Summer school programs to provide English language instruction for ELs.
4. Provision of supplemental instructional materials and supplies. (Materials must be supplemental to what the PNP would be required to provide.)

**Title IV Expenditures:** Allowable use of funds under each of the three content areas listed below may include but are not limited to: direct services for students, professional development for teachers and administrators, salaries of personnel to carry out identified programs and services, and supplemental educational resources and equipment. *~TIV-SSAE Non-Regulatory Guidance (2016), pg. 5*

Title IV program expenditures may include the following but are not limited to:

1. Well-Rounded Education: *~ESSA, SEC. 4101(1)(2)(3), TIV-SSAE Non-Regulatory Guidance (2016), pg. 6, & ESSA, SEC. 4107*
  - Improving access to foreign language instruction, arts, and music education
  - Supporting college and career counseling, including providing information on opportunities for financial aid through the early FAFSA
  - Providing programming and activities to improve instruction and student engagement in science, technology, engineering and mathematics (STEM), including computer science, and increasing access to these subjects for underrepresented groups

- Strengthening instruction in American history, civics, economics, geography, government education, and environmental education
- Programs and activities that use music and the arts as tools to support student success through the promotion of constructive student engagement, problem solving, and conflict resolution.
- Efforts to raise student academic achievement through accelerated learning programs.
- Activities to promote the development, implementation, and strengthening of programs to teach traditional U.S. history, civics, economics, geography, or government education.
- Instruction, programs, or activities in languages other than English or environmental education.
- Programs and activities that promote volunteerism and community involvement.
- Other activities and programs to support student access to, and success in, a variety of well-rounded education experiences.

2. Safe and Healthy Students: ~ESSA, SEC. 4101(1)(2)(3), TIV-SSAE Non-Regulatory Guidance (2016), pg. 6, & ESSA, SEC. 4108

- Evidence-based drug and violence prevention activities and programs.
- Providing School-based mental health services.
- Programs or activities that integrate health and safety practices into school or athletic programs, support a healthy, active lifestyle, prevent bullying and harassment, improve instructional practices for developing relationship-building, provide mentoring and school counseling to all students, improve school dropout, and establish learning environments that are essential for school readiness and academic success.
- High-quality training for school personnel.
- Child sexual abuse awareness and prevention programs or activities.
- Designing and implementing a locally tailored plan to reduce exclusionary discipline practices in elementary and secondary schools.
- Implementation of school-wide positive behavioral interventions and supports.
- Promoting community and parent involvement in schools
- Developing relationship building skills to help improve safety through the recognition and prevention of coercion, violence, or abuse

3. Effective Use of Technology: ~ESSA, SEC. 4101(1)(2)(3), TIV-SSAE Non-Regulatory Guidance (2016), pg. 6, & ESSA, SEC. 4109

- Providing educators, school leaders, and administrators with the professional learning tools, content, and resources.
- Developing or using effective or innovative strategies for the delivery of specialized or rigorous academic courses and curricula through the use of technology.
- Carrying out blended learning projects, which must include planning activities or ongoing professional development designed to support the implementation and academic success of the project aimed at teachers, principals, other school leaders or personnel.
- Providing professional development in the use of technology to enable teachers and instructional leaders to increase student achievement in STEM subjects including computer science.
- Providing students in rural, remote, and under-served areas with the resources to take advantage of high-quality digital learning experiences, digital resources, and access to on-line courses taught by effective educators.

# Consultation Process

**Timely and Meaningful Consultation:** The consultation shall occur before the local education agency makes any decision that affects the opportunities of eligible private school children to participate in programs under this part. ~ESSA, SEC. 1117(b)(3) To ensure timely and meaningful consultation, a local education agency shall consult with appropriate private school officials during the design and development of such agency's programs under this part. Such agency and private school officials shall both have the goal of reaching agreement on how to provide equitable and effective programs for eligible private school children. ~ESSA, SEC. 1117(b)(1)

TEA requires that an *Affirmation of Consultation with Private Nonprofit School (PNP) Officials* form to be completed in consultation with each participating private nonprofit school. This document is submitted to TEA each grant year.

## Step I: Orientation

The orientation is an initial meeting hosted in the spring of each school year to provide an overview of federal program services, requirements, eligibility, and qualifications to those private nonprofit school representatives that are interested in receiving federal funds during the upcoming school year. Orientation meetings are offered on separate dates and times. An initial consultation is scheduled with each private nonprofit school representative that elects to participate and whose school meets eligibility requirements.

Notification of Orientation: PNP representatives of private nonprofit schools located within Killeen ISD and the surrounding school districts of Copperas Cove, Belton, & Temple are mailed a certified return receipt invitation to attend an information session regarding federal funds. PNP representatives are requested to complete and return the letter of interest indicating whether they are declining services or whether they wish to participate. A written record of all information is digitally maintained at the LEA.

Invitations Include: Orientation Letter (**Appendix B**) and an Orientation Participation Form (**Appendix C**)

Advertisement of Orientation: An advertisement of the orientation is posted in the Killeen Daily Herald on two separate dates prior to the meetings.

## Step II: Consultation

Killeen ISD conducts consultation(s) with each participating private nonprofit school representative following the orientation. The goal is to determine the best use of funds to meet the needs of their students.

### Consultation Topics: (**Appendix D**)

- How the students' needs will be identified
- What services will be offered to meet those needs
- How, where, when and by whom the services will be provided (possible 3<sup>rd</sup> party)
- Assessment of services and how those results will be used
- Size and scope of equitable services
- Ombudsman
- Written Disagreement Rationale (**Appendix E**)

## Step III: How Funds are Generated for Title I Funds

Poverty Criteria: The number of low-income qualifying students located within the boundaries of a Title I school zone is used to determine total allocation for Title I, Part A funding. Qualifying annual gross income is determined by the income levels as established by the United States Department of Agriculture (USDA). Other poverty criteria would include- qualifying for Temporary Assistance to Needy Families (TANF), receiving food stamps, and/or being homeless. Families of students attending a



participating private nonprofit school are required to complete a Family Income Survey. \*\*To the extent possible, the identity of the private school families should be protected when gathering this information. ~ESSA, SEC. 1117(c)(1)(B)

#### Family Income Surveys (Who Generates Funds):

- Title I, Part A: Family Income Surveys are completed by each PNP family member. **(Appendix F)** The number of qualifying students, based on the poverty criteria, will then be multiplied by the per-pupil amount to determine total allocation.
- Title I, Part C: Direct services and support paid for with Title I, Part C funds are managed through ESC (Education Service Center) Region 12.

#### Students Served (Who May be Served):

- Those students (PK – 8<sup>th</sup> grade) that reside in an attendance zone of a Title I Killeen ISD campus and are low achieving. ~ESSA, SEC. 1117(b)(J)(ii) & SEC. 8501(a)(1) & (b)(1) & ESSA, SEC. 1113(a)(1) & TI Non-Reg Guidance(2003)B-1, TEA PNP PPT (May 2017), slide #22
- Low achieving or academic need is determined by multiple educational criteria. ~ESSA, SEC. 1115(c)(B), PNP FAQ (2017), 3.15 & TI Non-Regulatory Guidance (2003), B24, B25

### **Step IV: How Funds are Generated for Title II & TIV**

#### Total Enrollment Form (Who Generates Funds):

- Title II & Title IV, Part A: Each PNP representative is required to submit a total enrollment list of enrolled students. **(Appendix G)** The total number of qualifying enrolled students is multiplied by the per-pupil amount to determine allocation.

#### Who May be Served with TII & IV Funds:

- Teachers, leaders, and other educational personnel may be provided with services and other benefits as to improve their quality and effectiveness.

### **Step V: Needs Assessment**

Private school representatives will discuss in consultation with the district representative those needs as determined by multiple educational criteria. A needs assessment will be completed by the PNP to communicate those needs and to provide a financial plan outlining the federally funded expenditures. **(Appendix H)**

### **Step VI: Program Evaluation**

Private school representatives will evaluate each of the programs to determine effectiveness. **(Appendix I)**

## Purchasing Process

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Killeen ISD official facilitates consultations with PNP representatives to determine needs.

**Step 1:** PNP representative will communicate purchase requests to the district representative.

**Step 2:** District determines allowability of requested expenditure. Procurement procedures are followed as required.

**Step 3:** Professional Development- PNP shall request professional development through the LEA. The LEA will manage the logistics for allowable requests.

Materials- Items are initially delivered to the LEA warehouse and then transitioned to the Federal and State Programs Department.

- Items are added to the inventory database, bar-coded, and then checked-out by PNP.
- An annual inventory is conducted during the spring semester each year.

### **(Appendix J)**

- The control of funds under this part, and title to materials, equipment, and property purchased with such funds, shall be in a public agency, and a public agency shall administer such funds, materials, equipment, and property. ~ESSA, SEC. 1117(d)(1)

## Timeline

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**Timeline of Events:** The local education agency shall provide the PNP representative a timeline of events, actions, documentation due dates and deadlines during the initial consultation. (*i.e., agenda, meeting minutes, LEA program summaries, timeline, calendar of services, etc.*) ~TEA Random Validation Guidance Document **(Appendix K)**

## Roles and Responsibilities

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**Roles and Responsibilities:** Defined roles and responsibilities provide clarity, alignment, and expectations while enabling effective communication between PNP officials and Killeen ISD staff. To ensure that each of the federal programs meet the needs of eligible PNP students, teachers, parents, and leadership and that all compliance requirements are met, private nonprofit schools and Killeen ISD officials have designated roles and responsibilities. **(Appendix L)**

## Communication Log

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**Communication Log:** To ensure timely and meaningful consultation, the local education agency shall consult with appropriate private school officials during the design and development of such agency's programs under this part. ~ESSA, SEC. 1117(b)(1)

Consultations should be ongoing. ~TEA PNP PPT (October 2019), slide #10

Documentation that consultation has been ongoing since the initial contact. (*i.e., agenda, sign-in sheets, emails, communication log, meeting agendas, etc.*) ~TEA Random Validation Guidance Document

The district will maintain an account of all communication held between Killeen ISD Official and PNP Representatives, PNP Employees, and/or other appropriate parties.

**APPENDIX A**

**Fund Calculation Example  
Title I, Part A (Fund 211)**

<b>Steps</b>	<b>Calculation Description</b>	<b>Amounts</b>	<b>Formula</b>
1	LEA: Total low-income student enrollment from participating Title I attendance areas	30,000	n/a
2	PNP: Total eligible low-income students at PNP school	20	This # came from the family income surveys completed by PNP families.(excluding PK students)
3	Sum of LEA low-income students & PNP low-income students	30,020	30,000 + 20 (LEA + PNP)
4	Title I, Part A: Total Allocation	\$1,000,000.00	Amount located on TEA website > Finance & Grants > Grants Administration >Entitlements > ESSA Consolidated Amounts > Killeen ISD
5	PPA: Per Pupil Allocation (without cents)	\$33.00	\$1,000,000 / 30,020 (Total allocation divided by Sum of LEA & PNP Low Income Students)
6	PNP Reservation	\$660.00	\$33 X 20 (PPA X PNP students)
7	Parents & Families Proportion: total minimum proportionate share of equitable services	\$6.66	(\$1,000,000 X 1%) X (20/30020)
8	PNP Allocation: minimum proportionate share of equitable services for instruction and professional development	\$653.34	\$660 - \$6.66 (PNP Reservation – Parenting Proportion)

**Funds Calculation Example  
Title II, Part A (Fund 255)  
Title III, Part A (Fund 263)  
Title IV (Fund 289)**

<b>Steps</b>	<b>Calculation Description</b>	<b>Amounts</b>	<b>Formula</b>
1	LEA: total student enrollment	50,000	Total LEA enrollment
2	PNP: total student enrollment	200	This came from the Total Enrollment Form submitted by PNP. (excluding PK students)
3	Sum of LEA & PNP students	50,200	50,000 + 200 (LEA + PNP)
4	Program: Total Allocation	\$500,000.00	Amount located on TEA website > Finance & Grants > Grants Administration > Entitlements > ESSA Consolidated Amounts > Killeen ISD
5	PPA: Per Pupil Allocation (without cents)	\$10.00	Total allocation divided by Sum of LEA & PNP students
6	Calculated Private School Reservation	\$2,000.00	PPA X Total # of PNP Students Enrolled

## APPENDIX B



# KILLEEN INDEPENDENT SCHOOL DISTRICT

Jackson Professional Learning Center  
902 Rev R. A. Abercrombie Drive  
Killeen, Texas 76543

*(Current Date)*

Dear Private School Administrator,

Federal law requires that timely and meaningful consultation occur between the local education agency (LEA) and private school officials prior to any decisions that affect the opportunities of eligible private school children, teachers, and other educational personnel to participate in federal programs.

Private nonprofit schools have an opportunity to participate in the following federally funded programs conducted by Killeen ISD:

- Title I, Part A: Improving Basic Programs
- Title I, Part C: Education of Migratory Children
- Title II, Part A: Supporting Effective Instruction
- Title III, Part A: English Language Acquisition, Language Enhancement, & Academic Achievement Act
- Title IV, Part A: Student Support and Academic Achievement

Private nonprofit school eligibility for Title I is based on low-income data and enrollment. Funding for services is generated based on the low-income status of families of students attending the private school. PNP school students may receive services if a student attending the private school resides within a KISD attendance zone of a Title I participating campus and is academically at-risk. Services or benefits must be secular, neutral, and non-ideological. Please see page two for more information.

Killeen ISD, Federal and State Programs, will provide three opportunities for interested private nonprofit school representatives to attend a general orientation meeting. The purpose of the meeting is to explain and assist with the requirements for your school to participate in any of the programs available.

- ***(List Date of Meeting)***
- ***(List Date of Meeting)***

The orientation meetings will be held in room #5 at Jackson Professional Learning Center, 902 Rev R.A. Abercrombie, Killeen, TX 76543.

A Special Education Coordinator will also share information on Child Find. The Child Find effort focuses on locating children who may need special education services. Killeen ISD would like to partner with private schools in this effort.

Killeen ISD does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs, activities, or hiring practices.

Please complete the enclosed form, scan and email it to [davina.delgado@killeenisd.org](mailto:davina.delgado@killeenisd.org) or mail to our office by *(List Due Date)*.

## APPENDIX B

If you need directions to the Jackson Professional Learning Center or have any questions, please contact Davina Delgado, Funding Compliance Specialist, at 254-336-0209.

### Is your school eligible for Title I participation?

1. Is your school a private, nonprofit organization?

34 CFR 75.51 How to prove nonprofit status

An applicant may show that it is a nonprofit organization by any of the following means:

- (1) Proof that the Internal Revenue Service currently recognizes the applicant as an organization to which contributions are tax deductible under Section 501(c)(3) of the Internal Revenue Code;
- (2) A statement from a State taxing body or the State Attorney General certifying that:
  - The organization is a nonprofit organization operating within the State; and
  - No part of its net earnings may lawfully benefit any private shareholder or individual;
- (3) A certified copy of the applicant's certificate of incorporation or similar document if it clearly establishes the nonprofit status of the applicant.

2. Do you enroll students who live with Killeen ISD boundaries of Title I campuses?

3. Are these students in grades PK through 8th?

4. Are any of the families of these students living at or below the poverty level?

5. Are any of these students struggling academically/in danger of repeating a grade?

If the answer to all five questions is "yes", your school is eligible to participate in the Title I program with KISD. Other responsibilities apply.

APPENDIX C

Private Nonprofit School Officials  
Interested in Federal Program Participation with (List District)  
School Year (List School Year)

Federal Programs:

- Title I, Part A, Improving Basic Programs
- Title I, Part C, Education of Migratory Children
- Title II, Part A, Supporting Effective Instruction
- Title III, Part A, English Language Acquisition, Language Enhancement, & Academic Achievement Act
- Title IV, Part A, Student Support and Academic Achievement
- A Special Education Coordinator will also share information on Child Find. The Child Find effort focuses on locating children who may need special education services. Killeen ISD would like to partner with private schools in this effort.

Name of Private Nonprofit School: \_\_\_\_\_

Name of Private Nonprofit School Official: \_\_\_\_\_

Title of Private Nonprofit School Official: \_\_\_\_\_

Phone Number and Email of Contact: \_\_\_\_\_

School's Nonprofit Tax-Exempt ID number: \_\_\_\_\_

**Yes**, as a private nonprofit school, we are interested in the programs listed below and plan to attend one of the following information meetings. (Please check mark a date.)

\_\_\_\_\_ **List Date of Orientation**

\_\_\_\_\_ **List Date of Orientation**

\_\_\_\_\_ **No**, my private nonprofit school will not participate in any Title programs in (List School year).

\_\_\_\_\_ My school is **NOT** a private, nonprofit school. Please remove us from your mailing list.

**\*\*If interested, you may email or mail this completed form to the address listed below or you may provide your response through the QR code.**

Email Address: (List email Address)

Mailing Address: List Mailing Address)



**Please return completed form by (List Due Date).**

**APPENDIX D**

**Killeen Independent School District  
Equitable Services for Private Nonprofit Schools  
Consultation Form**

Name of School: \_\_\_\_\_

Consultation included meetings with private school officials before the LEA made any decision that affected the opportunities of eligible private nonprofit school participate in federal programs. Such meetings will continue throughout the implementation of the program and will include assessment of services provided. To ensure timely and meaningful consultation during the design and development of the LEA’s federal programs, the LEA has consulted with private nonprofit school officials on the assessment criterion listed on the table below.

<p>How will the student’s needs be identified? The following multiple, educationally related, objective criteria are used to determine private school student eligibility and to determine the academic needs of students. <i>ESSA, section 8501(c)(1)(A) &amp; ESSA, section 1115(c)(1)(B)</i></p> <p>Based on the results from the assessment tools and criteria listed below, the PNP will complete a needs assessment for each of the federal programs to identify targeted areas in need of improvement.</p>		
Grade Level	Assessment Tool	Criteria for Qualification

<b>Title I, Part A: Improving the Academic Achievement of the Disadvantaged</b>
What services will be offered? <i>ESSA, section 1117(b)(1)(B)</i>
How, where, and by whom will the services be provided? <i>ESSA, section 1117(b)(1)(C)</i>
How will the services be academically assessed? <i>ESSA, section 1117(b)(1)(D)</i>
How will the results of that assessment be used to improve those services? <i>ESSA, section 1117(b)(1)(D)</i>
What will be the size and scope of the equitable services provided to the eligible private school children? <i>ESSA, section 1117(b)(1)(E)</i>
What is the amount of funds available for those services? How was this amount determined? <i>ESSA, section 1117(b)(1)(E)</i>

APPENDIX D

Will the district provide services directly or through a separate government agency, consortium, entity, or third-party contractor? How was this determined? *ESSA, section 1117(b)(1)(I)*

Should equitable services to eligible private school students be provided (1) by creating a pool or pools of funds allocated based on all the students from low-income families in participating school attendance area who attend private schools or (2) in the LEA's participating school attendance area who attend private schools with the proportion of funds allocated based on the # of students from low-income families who attend private schools? *ESSA, section 1117(b)(1)((J)(i); example, TI Non-Regulatory Guidance (2003), page 37*

What method or sources of data will be used to determine the number of children from low-income families in participating school attendance areas who attend private schools?

When will services begin?

What (approximate) time of day will services be provided? *ESSA, section 1117(b)(k)*

When will the final amount of allocated funds be available?

**Title II, Part A: Preparing, Training, and Recruiting High-Quality Teachers, Principals, or Other School Leaders**

What professional development program/services will be designed to meet the needs of the students? *ESSA, section 8501(c)(1)(B)*

How, where, and by whom will the services be provided? *ESSA, section 8501(c)(1)(C)*

How will the effectiveness of these programs be evaluated? *ESSA, section 8501(c)(1)(C)*

What will be the size and scope of the equitable services provided? *ESSA, section 8501(c)(1)(E)*

What is the amount of funds available for those services? How was this determined? *ESSA, section 8501(c)(1)(E)*



## APPENDIX D

### **Title IV, Part A: Student Support and Academic Enrichment Program**

What services will be offered? *ESSA, section 8501(c)(1)(B)* (Well Rounded Education, Health/Safety, Technology)

How, where, and by whom will the services be provided? *ESSA, section 8501(c)(1)(C)*

How will the effectiveness of these programs be evaluated? *ESSA, section 8501(c)(1)(C)*

What will be the size and scope of the equitable services provided? *ESSA, section 8501(c)(1)(E)*

What is the amount of funds available for those services? How was this determined? *ESSA, section 8501(c)(1)(E)*

Timeline for future Meetings:

How will disagreements regarding this consultation be handled?

If the district disagrees with the views of the private school officials on the provision of services through a contract, the district is responsible for the following actions. *ESSA, section 1117(b)(2)*

KISD will provide in writing to such private school officials the reasons why the LEA (KISD) disagrees. An Ombudsman has been appointed and will be available should there be a need for resolution of disagreement.

Please note the following:

- Any remaining funds left at the end of this school year will NOT be carried over to next year's funding allocations. (Exception: If qualifying circumstances prevented the expenditure of funds, an Excessive Carryover Waiver request may be submitted to TEA. Approval is not guaranteed.) *TEA PNP PPT (October 2018), slides 11 & 12*
- Title I, II, IV services provided to private school children and educational personnel must be secular, neutral, and non-ideological. *ESSA, section 1117(a)(2) ESSA, section 8501(a)(2)*
- The control of funds used to provide services, materials, equipment purchased with those funds must be retained by KISD. *ESSA, section 1117(d)(1) ESSA, section 8501(d)(1)*
- Services to private school children may be provided by a district employee, PNP employee, and/or 3rd party. The servicing party must meet state licensing and certification requirements. *TEA PNP FAQ (2017), 3.12*

I affirm that the required consultation has occurred, and the information included above was discussed.

\_\_\_\_\_  
PNP Representative (Print Name)

\_\_\_\_\_  
PNP Representative (Signature)

\_\_\_\_\_  
Date

\_\_\_\_\_  
KISD Compliance Specialist (Print Name)

\_\_\_\_\_  
KISD Compliance Specialist (Signature)

\_\_\_\_\_  
Date

APPENDIX E

**Killeen Independent School District  
Written Disagreement Rationale**

Under ESSA (*Sections 1117 and 8501*), an independent school district is required to provide eligible private school children, their teachers, and their families services that are equitable to those provided in eligible public schools. Private school officials have recourse through the complaint process if they do not believe their eligible students or teachers are receiving equitable services. If there is a disagreement, KISD will provide in writing to such private school officials the reasons why the LEA (KISD) disagrees.

An Ombudsman at TEA has been appointed and will be available should there be a need for resolution of disagreement. The ombudsman serves as the primary point of contact for responding and resolving any complaints regarding equitable services. If private school officials believe that timely and meaningful consultation has not occurred or that the program design is not equitable with respect to eligible private school children, they should first discuss concerns with the local school district, regional education service center (ESC), or third-party provider responsible for coordinating the consultation between the two entities.

In the event the problem is not resolved, private school officials have the right to file a formal written complaint with the state’s ombudsman.

A written complaint must include:

- The complainant’s contact information
- The specific requirement(s) not met
- A statement that the local school district, ESC, or third-party provider has failed to meet requirements for equitable participation
- The facts on which the complaint is based
- The dates and events related to the complaint
- Description of documents that support the described facts
- The complainant’s efforts to resolve the complaint in other ways

**Complaints should be mailed directly to:**

Texas State Ombudsman for PNP Equitable Services  
Attn: Department of Grants Compliance and Oversight Texas Education Agency  
1701 N. Congress Avenue Austin, TX 78701

**PNP officials may electronically submit the written complaint at:**

[PNPombudsman@tea.texas.gov](mailto:PNPombudsman@tea.texas.gov)

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PNP Representative (Print Name) PNP Representative (Signature) Date

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KISD Compliance Specialist (Print Name) KISD Compliance Specialist (Signature) Date

## APPENDIX F

### Family Income Survey

#### **Name of School**

Information from (List School Year)

Snapshot Date: (List Date)

Due Date: (List Date)

(This information will be used to determine allocation amounts for the upcoming school year.)

The purpose of this survey is to collect data that will be used to determine the amount of funds available for the public school district to provide Title I instructional services to eligible students in our school.

Determining the number of our students, by public school district of residence, who would qualify for free and reduced-price meals, accomplishes this. The information requested below is confidential. It is not necessary to provide family name. (ESSA, section 1117 (c)(1)(B)) Thank you for your cooperation and prompt return of this form.

**(1) Find your family size and look at the annual gross income level listed beside it on the chart printed below.**

Number of Family Members	Annual Gross Income for (List School Year)
1	\$23,828
2	\$32,227
3	\$40,626
4	\$49,025
5	\$57,424
6	\$65,823
7	\$74,222
8	\$82,621
For each additional family member, add \$8,399	

\*If you are paid on a weekly or monthly basis, please multiply that amount by the number of weeks or months actually worked each year to determine your annual gross income.

**2. Please provide the following information:**

Question	Yes	No
Is your family income less than the amount on the chart on the line beside your family size?		
Is your family qualified for food stamps?		
Are you receiving Temporary Assistance to Needy Families (TANF)? (Formerly AFDC or Public Assistance)		

**(3) Please provide the following information:**

Home Street Address	City	Zip Code
What is the name of the school that your child(ren) are zoned for if they attended a Killeen ISD school?		
Grade Level(s) of Child(ren) Currently Enrolled at this School.		

Form valid from (List Dates)



# Equitable Services to Private Nonprofit Schools

## Title I, Part A: Improving the Academic Achievement of the Disadvantaged

- **How to Spend:** Primary expenditure will be for tutoring services to students that qualify and supplemental material to support instruction for those students.
- **Purpose:** To provide children with significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. *~ESSA, SEC. 1001*

## Title II, Part A: Preparing, Training, and Recruiting High-Quality Teachers, Principals, or Other School Leaders

- **How to Spend:** This fund may be spent towards professional development and/or professional development materials/programs to increase the quality of instruction for teachers, principals, and other school leaders.
- **Purpose:** Provides grants to State educational agencies and subgrants to local educational agencies to— “(1) increase student achievement consistent with the challenging State academic standards; “(2) improve the quality and effectiveness of teachers, principals, and other school leaders; “(3) increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and “(4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders. *~ESSA, SEC. 2001*

## Title III, Part A: English Language Acquisition, Enhancement, and Academic Achievement

- **How to Spend:** Primary expenditure will be for tutoring services to students that qualify and supplemental materials.
- **Purpose:** To ensure that English Learners and Immigrant students attain English proficiency and develop high levels of academic achievement in English and to meet the challenging State academic standards. *~TEA*

## Title IV, Part A: Student Support and Academic Enrichment Program

- **How to Spend:**
  1. Well-Rounded Education
  2. Safe and Healthy Students
  3. Improve the use of Technology
- **Purpose:** To improve students’ academic achievement by increasing the capacity of States, local educational agencies, schools, and local communities to— “(1) provide all students with access to a well-rounded education; “(2) improve school conditions for student learning; and “(3) improve the use of technology in order to improve the academic achievement and digital literacy of all students. *~ESSA, SEC. 4101*

**APPENDIX H**

Killeen Independent School District  
Private Nonprofit School Equitable Services  
Needs Assessment Form (School Year)

Name of Private Nonprofit School: \_\_\_\_\_

Check Mark the Federal Program for this Needs Assessment. (Only one program per form.)

Title I-A	Title II-A	Title III-ELL	Title IV-A
\$	\$	\$	\$

**Need #1:**

1. Subject area and/or skill that has a need for improvement:

\_\_\_\_\_

2. How was this need determined?

\_\_\_\_\_

3. List the material(s) and/or service(s) that will be purchased to address this need?

\_\_\_\_\_

4. How will the purchase of this material(s) and/or service(s) improve the academic achievement of students?

\_\_\_\_\_

**Need #2:**

1. Subject area and/or skill that has a need for improvement:

\_\_\_\_\_

2. How was this need determined?

\_\_\_\_\_

3. List the material(s) and/or service(s) that will be purchased to address this need?

\_\_\_\_\_

4. How will the purchase of this material(s) and/or service(s) improve the academic achievement of students?

\_\_\_\_\_

**APPENDIX I**

Killeen Independent School District  
Private Nonprofit School Equitable Services  
Program Evaluation (List School Year)

This form is to be completed at the end of the school year. (List Due Date)

Check Mark the Federal Program that is being evaluated. (Only one program per form.)

Title I-A	Title II-A	Title III-ELL	Title IV-A
Expended Amount	Expended Amount	Expended Amount	Expended Amount
\$	\$	\$	\$

**Evaluation of Program for Need #1:**

1. What was the need? (Reference Completed Needs Assessment for This Response)

\_\_\_\_\_

2. List the material(s) and/or service(s) that were purchased to address this need?

\_\_\_\_\_

3. Did student academic growth increase from these material(s) and/or service(s)?      YES      NO

4. How was this determined? (Provide data results with descriptive explanation. If data is not available, provide a descriptive explanation about the effectiveness of the expenditures for this program.)

\_\_\_\_\_

**Evaluation of Program for Need #2:**

1. What was the need? (Reference Completed Needs Assessment for This Response)

\_\_\_\_\_

2. List the material(s) and/or service(s) that were purchased to address this need?

\_\_\_\_\_

3. Did student academic growth increase from these material(s) and/or service(s)?      YES      NO

4. How was this determined? (Provide data results with descriptive explanation. If data is not available, provide a descriptive explanation about the effectiveness of the expenditures for this program.)

\*Form must be signed once the evaluation has been completed.

\_\_\_\_\_  
PNP Representative (Print Name)

\_\_\_\_\_  
PNP Representative (Signature)

\_\_\_\_\_  
Date

## APPENDIX J

### Killeen Independent School District Inventory Process

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- Newly purchased materials are bar-coded and added to the LEA inventory database before being distributed to a PNP school.
- Materials are maintained in a secured location at the Killeen ISD Federal and State Department.
- PNP representative(s) will sign/in & sign-out instructional materials as needed.
- Bar coded materials must be returned to the LEA at the end of each school year.
- Materials that are not bar-coded will be inventoried by the PNP and LEA for accountability at the end of each school year. (These items are generally physical education equipment.)
- Materials returned and maintained at the Killeen ISD Federal and State Department are inventoried for accountability at the end of each school year.
- If there are any missing materials, appropriate accountability actions will be pursued by the LEA.



## APPENDIX K

### Killeen Independent School District Timeline Overview

Month	Event/Actions
<b>June</b>	<ol style="list-style-type: none"> <li>1. (continued from May) Inventory of instructional, parenting, and professional development materials.</li> <li>2. KISD will continue with ongoing consultation meetings, initially held in May, to plan, solidify services, and finalize expenditures for the following:               <ul style="list-style-type: none"> <li>➤ program information of activities, events, parenting, and requirements</li> <li>➤ provide funding estimated/finalized amounts to PNP</li> <li>➤ plan funds based upon the PNP Needs Assessment</li> <li>➤ evaluate program and make suggestions about recommended changes to implement during the upcoming school year</li> </ul> </li> </ol>
<b>July</b>	<ol style="list-style-type: none"> <li>1. Inventory of instructional, parenting, and professional development materials</li> <li>2. KISD will complete/submit ESSA Grant Application</li> </ol>
<b>August</b>	<ol style="list-style-type: none"> <li>1. KISD will contact tutors about completing their employment application</li> <li>2. KISD will contact PNP official about any information that was not finalized during previous consultation; i.e., PD information, list of materials to be purchased, parenting requests, services to be provided</li> </ol>
<b>September</b>	<ol style="list-style-type: none"> <li>1. Tutoring services begin at PNP</li> <li>2. Disseminate updated family income survey to PNPs to determine TI funding for the next school year.</li> <li>3. Disseminate Total Enrollment Spreadsheet to participating PNPs</li> <li>4. Continue consultation with PNP officials about the status of services</li> </ol>
<b>October</b>	<ol style="list-style-type: none"> <li>1. PNP will submit Purchasing Request Form for instructional material.</li> <li>2. KISD will Order/Procure any requested instructional materials.</li> <li>3. KISD will Bar-Code and deliver any requested instructional materials</li> <li>4. Continue consultation with PNP officials about the status of services</li> </ol>
<b>November</b>	<ol style="list-style-type: none"> <li>1. Fund summary of balances will be sent to PNP</li> <li>2. Continue consultation with PNP officials about the status of services</li> </ol>
<b>December</b>	<ol style="list-style-type: none"> <li>1. New Allocated Amounts are received from TEA. Once amendment has been approved, schedule consultation with PNP to plan new amounts.</li> <li>2. Fund summary of balances will be sent to PNP</li> <li>3. Email expenditure deadline reminder for instructional materials.</li> </ol>
<b>January</b>	<ol style="list-style-type: none"> <li>1. Fund summary of new amounts will be sent to PNP. (if complete)</li> </ol>
<b>February</b>	<ol style="list-style-type: none"> <li>1. Fund summary of new amounts will be sent to PNP.</li> <li>2. KISD will schedule a consultation to plan the new amounts and prepare consultation documentation for re-allocations</li> <li>3. Orientation Invitation: KISD will contact surrounding ISDs to request the name of any existing or new PNPs in their district (KISD will check IRS, Comptroller, TEPSAC &amp; IALDS for list of participating PNPs)</li> <li>4. Email expenditure deadline reminder for instructional materials and Summer PD requests.</li> </ol>
<b>March</b>	<ol style="list-style-type: none"> <li>1. Fund summary of balances will be sent to PNP.</li> <li>2. KISD will mail orientation invitations to PNPs located in: Copperas Cove, Belton, Nolanville, Killeen, Harker Heights, Temple</li> <li>3. KISD will Prep Orientation AD for the announcement of PNP orientation dates and send to communications</li> <li>4. KISD will request summer school recommendations from PNP</li> <li>5. Notify PNP that the expenditure deadline will be at the end of this month.</li> </ol>
<b>April</b>	<ol style="list-style-type: none"> <li>1. Orientation Meetings will be hosted by KISD.</li> <li>2. Fund summary of balances will be sent to PNP.</li> <li>3. KISD will advertise in KDH for PNP Orientation</li> <li>4. KISD will email list of Summer PD Opportunities hosted by KISD</li> <li>5. KISD will email expenditure deadline for KISD Summer PD requests.</li> </ol>
<b>May</b>	<ol style="list-style-type: none"> <li>1. Orientation Meetings will be hosted by KISD.</li> <li>2. KISD will schedule/host independent Consultation Meetings with each PNP representative to discuss the following:               <ul style="list-style-type: none"> <li>➤ Activities, events, parenting, etc.</li> <li>➤ Program information, funding, and requirements</li> <li>➤ Plan funds based on PNP needs assessment</li> <li>➤ Evaluation Program: Discuss recommended changes to implement for the upcoming school year.</li> </ul> </li> <li>3. Annual Spring Inventory (May/June): Inventory for instructional, parenting and PD materials.</li> </ol>

## APPENDIX L

### (Name of PNP) Killeen Independent School District Roles and Responsibilities

PNP Initials	PNP Responsibilities Date: _____	KISD Official Initials	KISD Official Responsibilities Date: _____
	Provide the following information of students being served: address, grade level, qualifying assessment data.		Provide PNP a spreadsheet with the consolidated student information and data.
	Develop the needs assessment before any services, use of materials, and/or PD may begin.		Assist with the disaggregation of data to determine student needs.
	Provide data to support student & teacher needs listed in the “needs assessment”.		Provide instructional guidance in the completion of the needs assessment.
	Collaborate with district personnel regarding the multiple education criteria that will be used to identify students’ needs. This information will guide decisions concerning services, professional development training and/or the purchase of instructional material.		Collaborate with district personnel regarding the multiple education criteria that will be used to identify students’ needs. This information will guide decisions concerning services, professional development training and/or the purchase of instructional material.
	Collaborate with district personnel regarding parental, family, and community engagement.		Provide input and assistance with developing and conducting parental engagement activities, training and documentation requirements.
	Provide information regarding professional development activities that will be conducted		KISD will process any required documentation, registration, reservations, and/or payment of costs.
	Consult with district personnel to determine how federal funds will be expended to meet the needs of students.		Hire/contract qualified personnel to provide services to meet the academic needs of qualifying students.
	Assist in determining how services and students will be assessed.		Will consult with the PNP to determine allowable assessment data.
	Participate in ongoing consultations to ensure that the program is coordinated with the regular school program of instruction, the program is accomplishing the goals indicated in the needs assessment, and to verify that required documentation is being completed.		Provide continuous consultation opportunities with PNP officials to discuss the status of services, student data, and requirements.
	Assure that services supplement but NEVER supplant the level of services/PD/materials that would, in the absence of Title I, II, and/or IV be available to participating children in private schools.		Ensure the delivery of services supplement the regular classroom instruction through processes, such as, documentation reviews, site visits, consultations.
	Monitor the use of supplies, materials, and equipment purchased with Title I, II, and/or TIV funds to ensure that their use is secular, neutral, and non-ideological.		KISD will barcode all material and monitor its use through school visits. An annual inventory is conducted to verify that all materials are present and accounted for. Any missing items will be processed for replacement.
	Submit nonprofit tax-exempt verification documents.		Will verify nonprofit tax-exempt status.
	Complete all required documentation on time, as outlined on the timeline.		Will send reminders to ensure timeliness of submissions.
	Sign assurances committing yourself and the school to meet all legal requirements and realizing that KISD shall remove equipment, supplies, and services if necessary to avoid unauthorized use of the equipment, supplies or services for anything other than Title I, Part A purposes.		Sign assurances committing KISD to meet all legal requirements and will remove equipment, supplies, and services if necessary to avoid unauthorized use of the equipment, supplies or services for anything other than Title I, Part A purposes.