

# Private Nonprofit School Orientation



"If a child cannot learn in the way we teach, we must teach in a way the child can learn." ~Unknown



# Evolution of the Education Act

1965

## ESEA: Elementary & Secondary Education Act

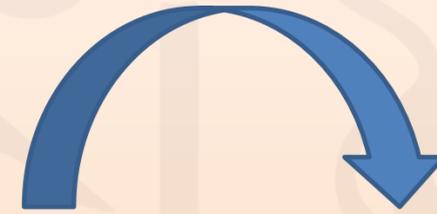
Purpose: To improve education equity for student from lower-income families by providing federal funds to school districts serving students of low SES families.



2002

## NCLB: No Child Left Behind

The Education Act was reauthorized.



2015

## ESSA: Every Student Succeeds Act

Purpose: To ensure that schools provide quality education for all students. This act provides benefits to private school students and their families, teachers, and other education personnel, including those in religiously affiliated schools.





# Federal Programs

**Title I, Part A:** Improving Basic Program

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

**Title II:** Supporting Effective Instruction

**Title III:** English Language Acquisition, Enhancement,  
& Academic Achievement Act

**Title IV:** Student Support and Academic Enrichment

## Definitions

**Definition of Nonprofit:** As applied to an agency, organization, or institution, means that it is owned & operated by one or more corporations or associations whose net earnings do not benefit, & cannot lawfully benefit, any private shareholder or entity. *~34 CFR (Code of Federal Regulations) 77.1*

**Definition of Nonpublic:** As applied to an agency, organization, or institution, means that the agency, organization, or institution is nonprofit and is not under Federal or public supervision or control. *~34 CFR (Code of Federal Regulations) 77.1*

**Definition of Private:** As applied to an agency, organization, or institution, means that it is not under Federal or public supervision or control. *~34 CFR (Code of Federal Regulations) 77.1*

## How To Provide Evidence of Nonprofit Status

1. Proof that the IRS currently recognizes the applicant as an organization to which contributions are tax deductible under Section 501(c)(3) of the Internal Revenue Code. *~34 CFR 75.51-How to prove nonprofit status*
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. *~34 CFR 75.51-How to prove nonprofit status*
3. A certified copy of the applicant's certificate of incorporation or similar document if it clearly establishes the nonprofit status of the applicant. *~34 CFR 75.51-How to prove nonprofit status*

**\*\*IRS (EIN- Employer Identification Number)**



# Title I, Part A – Improving Basic Programs

**Purpose:** This grant 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*

## **Examples would include the following:**

- Tutoring Services: (applicable to qualifying students)
- Technology: Software programs (example – Reading A-Z), computer equipment
- Instructional Supplies: Materials that may be used to support those students being served.
- Counseling/Mentoring

# Title I Allowable Services

- Services should be provided in the least disruptive and least expensive location to eligible students. *~TI Non-Regulatory Guidance (2019)C-21, pg. 35*
- Use of effective instructional on research-based reading/mathematical instruction. *~TI Non-Regulatory Guidance (2019)C-36, pg. 38*
- Extended Day Services (tutoring before or after school, Saturday, or summer programs)
- Computer Assisted Instruction
- Combination of Any of the Services Listed Above
- Coordination and Integration of other Services and Programs to Serve Students; to include 3<sup>rd</sup> party contracted services.
- Parent Literacy (Andrea Dykes, our District Parenting At-Risk Specialist, will provide information regarding allowable parenting expenditures/services.)

# Title I Funds (Fund 211)

## How funds are generated....

**Step #1:** PNP families complete an income survey. This information will determine funding allocation amount. *~ESSA, section 1117(a)(4)(A)(i), 1117(C)(1)(B) (Qualifying incomes are based on the USDA income levels.)*

**Step #2:** The number of qualifying students will be multiplied by a set per pupil amount.

**Special Note:** PK students may not be used to generate federal funds. *~ESSA Funding Reference Manual (2018)*

**(Calculation explained on the next slide.)**

## Who may receive services?

Students may receive services if they are struggling academically, as determined by multiple educational criteria. *~ESSA, section 1115(c)(1)(B), PNP FAQ 2017 3.15, TI Non-Regulatory Guidance (2003), B24*

Examples: state assessment scores, report card grades, grade level retention

## Requirements

- ✓ The student must reside in an attendance zone of a Title I KISD campus. *~ESSA, section 1117(b)(J)(ii) & ESSA, 1113(a)(3)(B)(i) & TI Non-Regulatory Guidance (2003) B-1, PNP FAQ (2017), 3.6*
- ✓ Services to identified students must begin in September
- ✓ PK student must be 4 years old on or before September 1.

## Grade Levels

Students in grades PK – 8th may be served if the student is residing in an attendance zone of a Title I school-wide campus.

## TI Schoolwide Campuses:

- ✓ All Elementary Schools
  - PK students may only be served if the PNP provides a full day academic program with at least one additional grade span. *~TI, Non-Regulatory Guidance (2016), pg. 28 & TEA PPT (2016), slide 23*
- ✓ Middle Schools: Manor, Palo Alto, Rancier, Eastern Hills, Live Oak Ridge
- ✓ (Must serve schools that are over 75% economically disadvantaged.) *~ESSA, section 1113(a)(3)(B)(i)*



**Funding  
Calculation  
Example**

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

Steps	Calculation Description	Amounts	Formula
1	Total low-income student enrollment in District from participating Title I attendance areas.	10,000	n/a
2	Total eligible low-income students at PNP as determined by family income surveys.	20	n/a
3	Total eligible District low income students plus eligible PNP students.	10,020	10,000 + 20
4	Total Allocation for Program	\$5,000,000	This information may be found on the TEA website>Finance & Grants>Grants Administration>Entitlements>ESSA Consolidated Final Amounts by LEA>Killeen ISD.
5	Per Pupil Amount (Total Allocation divided by combined total of eligible low income students from PNP and District.)	\$499.00	\$5,000,000/ 10,020
6	Calculated PNP Reservation	\$9,980.04	\$499 X 20 This calculated amount represents the total allocated amount reserved for the PNP. (Multiply the Per Pupil Amount by the Total # of PNP students.)
7	Total Minimum Proportionate share of Equitable Services for <b>Parents and Families.</b>	<b>\$100.00</b>	(5,000,000 x 1%) X (10,020/20)
8	Total PNP Reservation for Services and Goods (minus parenting funds)	<b>\$9,880.04</b>	\$9,880.04 - \$100

# Title I, Part C – Education of Migratory Children

**Purpose:** 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

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

**~Yolanda Rollins (254)297-1111**



# Title II, Part A – Supporting Effective Instruction

**Purpose:** 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*

## Examples of Allowable Expenditures:

- **Professional Development:** Activities for private school teachers, principals, & other school leaders to address the specific needs of their students. ~*PNP, FAQ (2017), 4.1*
  - ✓ Workshops, conferences, consultants, PD through KISD or ESCs training should be scientifically research-based instruction. Activities may include training to improve knowledge in one or more of the core academic subjects: ELAR, Math, Science, SS.
  - ✓ This training should be substantial and shared with others.
  - ✓ This training should benefit the overall knowledge in quality of instruction for teachers and/or administrators.
- **Software-** Professional Development training through on-demand courses, online seminars
- **Instructional Coaches-** Teacher development through guidance, training, and other resources as needed.
- **Book Study:** Opportunity for educators to engage in professional discourse around a specific topic of teaching and learning.





## Title II & IV Funds

### How funds are generated....

**Step #1:** PNP school is required to complete a total enrollment spreadsheet listing the names, grade levels, and DOB of each student. A list of instructional personnel should also be included in this report.

**Step #2:** Excluding PK students, the number of total enrolled students will then be multiplied by a set per pupil allocation amount.

Steps	Calculation Description	Amounts	Formula
1	Total Student Enrollment in District	30,000	n/a
2	Total Student Enrollment in PNP (This # came from the total enrollment spreadsheet.)	100	n/a
3	Total Enrollment (Total # of Students in District + Total # of PNP Students)	30,100	$30,000 + 100$
4	Total Allocation for Program	\$200,000	This information may be found on the TEA website>Finance & Grants>Grants Administration>Entitlements>ESSA Consolidated Final Amounts by LEA>Killeen ISD.
5	District Per Pupil Allocation (Total Allocation divided by the Total Enrollment)	\$6.64	$\$200,000 / 30,100$
6	Total Calculated Private School Reservation	<b>\$664.00</b>	$\$6.64 \times 100$ This calculated amount represents the total allocated amount reserved for the PNP. (Multiply the Per Pupil Amount by the Total # of PNP students.)

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

**Purpose:** 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

## **Example Services:**

- Tutoring services before, during, or after school hours.
- PD for PNP school teachers of ELs.
- Provision of supplemental instructional materials and supplies. (Materials must be supplemental to what the PNP would be required to provide.)

**Guidelines:** Students may reside in Mexico or other states and still receive TIII services if that student qualifies and attends a PNP located in KISD.

If the PNP school has a student that meets the definition of English Learner, appropriate representatives will be contacted to initiate the identification process and to determine qualifying services.





# Title III, Part A

## Definition of English Learner:

- ✓ An individual who was not born in the United States or whose native language is a language other than English;
- ✓ who is a Native American or Alaska Native, or a native resident of the outlying areas; and
- ✓ 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
- ✓ 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 section 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.



# Title IV – Student Support & Academic Enrichment

There are three main components of TIV Funds: (1) Provide students access to a well-rounded education. (2) Improving academic outcomes by maintaining safe and healthy students. (3) Improve the use of technology to advance student academic achievement ~TEA

## Examples would include the following:

- **Well-Rounded Education:** Integration of Arts into core subject areas; i.e., Music to teach Math, STEM programs *(Definition for Well-Rounded Education: means courses, activities, and programming in subjects such as English, reading or language arts, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, arts, history, geography, computer science, music, career and technical education, health, physical education, and any other subject, as determined by the State or local educational agency, with the purpose of providing all students access to an enriched curriculum and educational experience.)*~USDE
- **Health/Safety:** Drug Abuse, Alcohol, Tobacco & Smokeless Tobacco Prevention, Digital Wellness, Counseling Services to Promote Mental Health, Education on Nutrition & Physical Exercise
- **Technology:** PD on how to integrate technology into content instruction.





# Funding Guidelines

- ❑ KISD provides materials and services: The district maintains control of funds, materials, equipment, and property purchased with federal funds. *~ESSA, section 1117(d)(1)*
- ❑ Money may not be given directly to the PNP. *~ESSA, section 1117(d)(1) & ESSA, section 8501(d)*

- ❑ Services must be supplemental and may not replace services that would, in the absence of federal funds, be provided by PNP. *~ESSA, section 1115(c)(1)(B)(A)*
- ❑ Educational services or other benefits, including materials and equipment, shall be **secular, neutral, and non-ideological**. *~ESSA, section 1117(a)(2)*
- ❑ KISD must consult with PNPs about needs and how best to meet those needs with federal funding. Consultation must occur before KISD makes any decisions that affect the opportunities of eligible private school children, teachers, and other education personnel. *~ESSA, section 1117(b)(3)*

# PNP will meet with KISD to discuss the following information.

## Consultation

### Topics of Discussion

- ✓ How will the LEA identify private school students' academic needs?
- ✓ What services will be offered?
- ✓ How, where, and by whom will services be provided?
- ✓ How will academic progress be assessed and how will the results of that assessment be used to improve that federal program?
- ✓ The amount of proportionate funds allocated for each of the federal programs.
- ✓ TEA Affirmation Form: TEA affirmation of consultation shall be signed by officials from each participating private school to serve as acknowledgement of eligible programs and participation status.

## Evaluation of the 2021-2022 Federal Programs

An evaluation of the effectiveness of each program will need to be completed.

## Needs Assessment

- 2022-2023: Needs Assessment Form will need to be completed for each program.
- Before funds may be expended, there must be a plan to address identified needs.

# OMBUDSMAN

*~ESSA section 1117(a)(3)(b) & ESSA, section 8501(a)(3)(b)*

**Each state agency will name an Ombudsman.** (LaNetra Guess) Texas has designated an ombudsman to monitor and enforce equitable services requirements under Title I, Part A and Title VIII of ESSA and the CARES Act, ESSER. The ombudsman serves as the state's primary point of contact for addressing questions and concerns from private school officials and local school districts. Other ombudsman duties include the following:

- ✓ Providing technical expertise in interpreting, understanding, and implementing accountability requirements for equitable services
- ✓ Providing guidance to local school districts and private schools, as needed
- ✓ Addressing complaints regarding consultation and/or equitable services provisions: Refer to the PNP Complaint Forms section above for links to the complaint procedures and forms in both English and Spanish.
- ✓ Ensuring all equitable services reporting requirements are met
- ✓ Overseeing the TEA Private School Equitable Services Workgroup
- ✓ Developing monitoring protocols
- ✓ Participating in TEA's Title I Committee of Practitioners meetings
- ✓ Participating in the Texas Private School Accreditation Commission (TEPSAC) and International Association for Learner Driven Schools (IALDS), and Texas Private Schools Association (TPSA) meetings



## TEA Complaint Form

**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



**June 23, 2022**

**Deadline for the initial consultation and the submission of all required documents.**

*The grant application will be submitted the last week of June. Without the required documentation, the requesting private nonprofit school will not qualify for participation during the 2022-2023 school year.*

