

District: Greenville Public School District
Section: M - Education Agency Relations
Policy Code: MBA - Equitable Services for Private Schools

Equitable Services for Private Schools

As a condition of receiving its federal funding allocations, the Greenville School District makes Assurances to provide equitable services to private schools in its attendance area, and, if necessary due to Greenville School District residents attending private schools in outside districts, by contribution to those outside districts when applicable.

The following general procedures will be used:

Private School Search, Initial Contact, Consultation and Plan

Search

In January of each year, the Federal Programs Director will conduct a search for private schools in the District's attendance area using the following means:

1. Internet search: A printout of an Internet search must be retained as evidence of implementation of the private school search.
2. Intra-office email: Circulate an email to District office staff, asking to share knowledge of any new private schools that have started up in the District's attendance area. Retain as evidence of implementation of the private school search.

Initial Contact

By the end of January, the Director of Federal Programs will contact via certified letter the Headmaster/Principal of any private school(s) located in the District in a timely manner to determine whether or not they desire to participate in equitable services for the upcoming year.

- MDE Office of Federal Programs makes an "Initial Contact Letter and Intent to Participate" form available for the District to send to each private school.
- The above-mentioned form established a 30-day deadline for a response to the initial contact. Follow-up calls and emails to the private school are required if there has been no response within two weeks of sending.
- A log of these follow-up communications must be retained.
- If the private school does not respond to these efforts, it will be disqualified from participation for the upcoming school year.

If the Headmaster/Principal indicates a desire to participate, a consultation meeting shall occur no later than March 31st.

Consultation

For each participating private school, an initial consultation meeting will be held at a location agreed upon by the Director of Federal Programs and the Headmaster/Principal of the private school (or virtually). The following topics will be discussed during the consultation meeting if the private school chooses to participate in the equitable services program. MDE makes a Consultation Checklist available for Districts

to use during this process. The Checklist is aligned with the Equitable Services Plan Template, also made available by MDE Office of Federal Programs. During the initial consultation meeting, the following topics will be discussed:

- for each program the private school wishes to participate in, the amount available for services and how that amount was (or will be) determined (including Title I-A considerations, see below);
 - whether to pool funds to provide services for school groupings, or use a school-by-school approach;
 - whether to coordinate services using Title I-A funds and non-Title I-A funds to target I-A participants (optional);
 - how student's needs will be identified;
 - what services will be offered to which eligible student groups;
 - how, where, when, and by whom the services will be provided; options discussed;
 - how the services will be assessed; how assessment results will be used to improve the services;
 - how and when the District will make decisions about problems with the delivery of services;
 - parent and family engagement, if applicable;
 - professional development for private school administrators and educational staff, if applicable;
 - private schools cannot be reimbursed* – the District must spend funds and perform all administrative tasks related to purchasing. *Only in the case of Title II-A professional development can individual private school staff be reimbursed for costs associated with professional development (enrollment, travel, lodging, per diem); and
 - complaint process if the private school is, or becomes, dissatisfied.
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- If the District is contemplating a transfer of program funds for the upcoming school year which would impact the private school's equitable shares, discuss in consultation with the private school before any decision is made by the District, and receive private school input to consider during the decision-making process. Complete MDE Office of Federal Programs Affirmation of Consultation for Transfer form, with the private school's principal marking "agree" or "disagree" and signing. Upload to MCAPS alongside the Equitable Services Plan. Notify MDE's Ombudsman of any disagreement.

Equitable Services Plan

An Equitable Services Plan is the ultimate outcome of consultation, though some time may pass while continuing consultation occurs prior to Plan completion. The Plan is filed with MDE OFP via MCAPS, according to OFP's published schedule, normally by the end of May. MDE OFP publishes a yearly template for this purpose. The Plan describes how equitable services will be provided in as much detail as possible. The Plan may be amended over time, and estimated amounts may initially be used. The private school's representative must sign the Plan and agree or disagree with the Plan's details. If disagreement is indicated, contact the Ombudsman at MDE OFP.

Procedures Specific to Title I-A

Establishing Funding Level

For private schools participating in Title I-A, a low-income student count must be established to determine funding level.

At the initial consultation meeting, the method for establishing this count is agreed upon. After private school input, the District can make the final decision on the method used. Use one of the following methods:

1. Actual Free-and-Reduced-Price Lunch data if the private school participates in that program; or
2. Household income data cross-referenced with the Free-and-Reduced-Price Lunch income qualification levels, as shown in the federal table provided in MDE's Household Income, Address and Grade Level Survey form available yearly from MDE's Office of Federal Programs. This form is provided to the private school, sent home or emailed to families, and returned, whereupon qualifying forms are presented to the District.
3. Use of household income data supplied for need-based financial aid at the private school, which data is then cross-referenced with the same income qualification table as in (2.), above.

The number of private school low-income students who are residents in the Greenville School District's attendance area are entered in MCAPS, which performs the proportional division of funding resulting in the equitable share. Any contributions from outside districts are added separately.

Outside District Contributions

For any identified low-income students with an address in an outside District's attendance area, Greenville Public School District (Greenville) will contact that outside District for verification that (1) the student's address is in that outside District and (2) that the student would attend a Title I-A served school and grade level if the student had attended public school in that District. If the outside District confirms, Greenville will send the outside District MDE OFP's *Memorandum of Understanding* form template, documenting a pooling agreement between Greenville and the outside District for the given number of identified students, whereby Greenville will invoice the outside District and that District will pay a per-pupil share of its Title I-A allocation to Greenville to be administered by Greenville in its Title I-A program at the private school, and that Greenville will copy the outside District on its assessments of the I-A program.

This process works similarly when/if Greenville is notified of residents in its attendance area who attend private school in an outside District.

Establishing the Service-Recipient Group

Following the identification of low-income students, the Director of Federal Program will determine the number of students eligible for services. Students identified as low-income students who generate Title I-A funding may or may not be among the sub-group of academically at-risk students identified for receipt of I-A services. The at-risk sub-group will be identified by an academic ranking of students in consultation with the private school, with a logical cut-off chosen.

Student achievement data, if available, would be used to determine the eligibility of the students. However, if the data were not available a comprehensive assessment in English/Language Arts and Mathematics will be administered to each student in the private school(s). Students not showing proficiency on this assessment will be considered eligible for services.

Tutoring

Title I-A tutoring assistance may be delivered by a District employee, outside contractor, or private school employee* acting as a contractor for the District, but must not be delivered during ordinary instructional time (so, before or after school, or during a study-hall period). *If a private school teacher delivers Title I-A tutoring assistance, the private school teacher may only do so during times when he/she is not simultaneously being paid by the private school (i.e., the tutoring must be delivered before or after school).

Assessment of the tutoring or other academic support program will be based on tracking the performance grades and test scores, as applicable, of the students receiving the academic support.

Procedures Specific to Title II-A, IV-A and other Title Programs if applicable

Equitable Share Calculation

Equitable shares for Titles II-A and IV-A are determined not by a low-income count, but by using the total K-12 enrollment of the private school, as appearing on the *Intent to Participate* form returned to the District by the private school, and verified as the private school's March attendance during the consultation meeting. If other programs become applicable for equitable services, MDE OFP will be contacted to verify funding methodology. MCAPS calculates the equitable share using this data, in the course of the District's completion of its funding application.

Activities

Private school Administrators, Faculty and Support Staff will be invited to participate in professional development activities conducted by the District using either federal, state or local funds that are relevant to their standards or instructional methods. They will also be able to attend professional activities that meet the guidelines of on-going, job embedded, sustainable professional development funded by Title II, Part A equitable share funds. Individual staff may be reimbursed for associated costs, though the private school itself can never be reimbursed.

Title IV-A activities would be provided on-site at the private school(s) either by the faculty of the private school(s) or by the faculty from schools within the District. Any faculty members involved will be required to attend professional development to train on the activities, if applicable. Faculty members for both the private school(s) and the public schools not participating in providing the services will have the option to attend the training sessions.

An assessment of II-A, IV-A, and other program activities may be completed by a report of relevant data, or a narrative report on activities, including survey feedback from participants, if applicable. Assessments will be retained as evidence of implementation.

General Procedures Applying to All Programs

Complaints

If a complaint arises, the private school principal should seek resolution by alerting the District's Federal Programs Director. If the complaint remains unresolved, or the private school does not accept the suggested resolution, contact the Equitable Services Ombudsman at MDE's Office of Federal Programs.

Equipment

All equipment purchased with federal funds to be used at a private school(s) within the boundaries of the District shall remain the property of the District, and the policies and procedures for fixed assets for the District will apply. All equipment will be tagged with the appropriate fixed asset tag and will be inventoried as prescribed in the policies and procedures of the District. Reimbursement of equipment lost by the private school(s) shall be the responsibility of the employee to which the equipment was assigned based on the value determined by the policies and procedures for fixed assets of the District. All equipment will be moved back to the District during the summer break, unless used in programmatic use (summer program). The District is responsible for the repair of any equipment needing repair during the school year. It shall be the responsibility of the private school(s) to meet any requirements under the Child Internet Protection Act if the equipment is used to access the Internet. Parents and Students will be required to accept the Acceptable Internet Usage Policy of the District in order for the students to access the Internet using equipment purchased with federal funds.

The Headmaster/Principal of the private shall attest in writing that all equipment and/or supplies purchased with federal funds shall be used in concordance to the guidelines of the federal program that purchased the equipment and or supplies.

Adopted Date:

Approved/Revised Date: