Equitable Services Statewide Initial Consultation Meeting





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## Before we begin...

- Sign-in
- Pick up an agenda, Form A and Form B
- Complete a name tent with the name of your LEA, Private School, Organization or Agency (GaDOE)

## Housekeeping

- Restroom locations
- Break from 10:40-10:50
- Phones
- Kudos
- Acronyms
- Parking lot questions



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## **Agenda- Session 1**

- 9:00-9:10- Welcome & Introduction
- 9:10-9:25- Updates, Overview and Role of State Ombudsman
- 9:25-9:50- Title IA
- 9:50-10:05- Title IC
- 10:05-10:25- Title IIA
- 10:25-10:40- Title IIIA
- 10:40-10:50- Break
- 10:50-11:15- Title IVA
- 11:15-11:30- Title IVB
- 11:30-11:55- Private Schools and LEAs (Discussion)
- 11:55-12:00- Closing and Adjourn (Session 1)



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# Welcome Introductions



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## Welcome

- Private Schools/Organizations- name, private school/organization you represent, Title, number of different LEAs your students live in
- LEA- name, LEA, Title, Federal programs you work with in your role, number of private schools your district works with for Equitable Services
- GaDOE- name, division at the GaDOE, Title, programs you work with in your role



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# Updates Overview

## **Updates and Overview**



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- Initial Meetings
  - Same information- overview
  - Some private schools, particularly in METRO, work with multiple LEAs, some up to 12
- Consistent message across Georgia
- Improve Equitable Services across Georgia
- Provide professional learning to both private schools and LEAs
- Display the Online Platform
- Reduce potential findings



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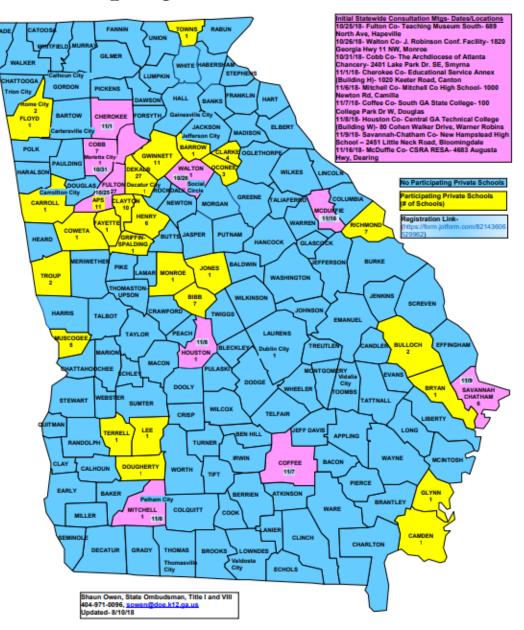
## Overview

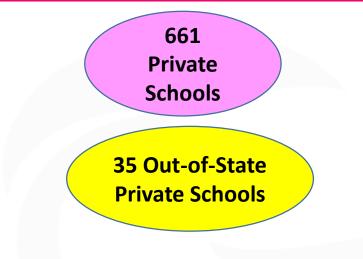
- How many private schools serve Georgia students?
- How many private schools outside of Georgia serve Georgia students?
- What is the process for starting a private school in Georgia?
- Who oversees private schools in Geogia?
- How does a private school know to submit a DE1111?





#### **Participating Private Schools (2018-2019)**





### Georgia Depar

10/27/2018



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## **DE1111**

- What is the DE1111?
- Who submits the DE1111?
- To whom is the DE1111 submitted?
- How often is the DE1111 submitted?



### **DE1111**

- Required by State Law each year
- Must be updated by private school each month if a student enrolls or withdraws
- Federal programs should be communicating with the Superintendent's office to stay updated on the numbers (recommend to have a procedure in place for collecting and communicating this information)
- Who signs off on the DE1111? Recommend only one person in the district

### **DE1111**



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- Try to use the date specific to data collections (FTE date- First Tuesday in October)
- Does not have to be submitted on the form on the GaDOE website
- Private schools do not send information to State Charters
- LEAs should have procedures in place for collecting the DE1111



#### PRIVATE SCHOOL REPORT OF STUDENTS ENROLLED

Georgia law (O.C.G.A. § 20-2-690) provides "within 30 days after the beginning of each school year, it shall be the duty of the administrator of each private school to provide to the school superintendent of each local public school district which has residents enrolled in the private school a list of the name, age, and residence of each resident so enrolled. At the end of each school month, it shall be the duty of the administrator of each private school notify the school superintendent of each local public school district of the name, age, and residence of each student residing in the public school district who enrolls or terminates enrollment at the private school during the immediately preceding school month.

NAME OF PRIVATE SCHOOL:			
TOTAL ENROLLMENT: GRADES: _			
ADDRESS:			
CITY:	STATE:	ZIP CODE:	
TELEPHONE:			

PUBLIC SCHOOL SYSTEM TO WHICH SUBMITTED:

#### INSTRUCTIONS:

1. If you are reporting students enrolled this year, provide names, ages, and addresses.

If you are reporting students who have withdrawn after having been enrolled this year, write a "W" with the date or withdrawal in the column headed E/W and send the form to the appropriate school superintendent.
 If you are reporting students who have entered after you have submitted the report to the school superintendent, provide student information and write an "E" with date of entry in the column headed E/W and send the form to the appropriate school superintendent.

E/W	NAME OF STUDENT(S)	AGE	GRADE LEVEL	RESIDENCE	CITY/STATE



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#### List of Private Schools for FY2019 Non-Private School Profit Telephone Address <u>City</u> State Zip County Email Web Address Sch Name Flag 7290 Covington Hwy Lithonia GΑ 30058 DeKalb N 7704848226 thegiftedchild@bellsouth.net 1 A Unique Learning Center none A+ Preparatory Academy 100 Dudley Drive Ellenwood 30294 Henry Ν 7703890173 friendapreparatory@att.net APREPATORYLEARNINGACADEMY.COM 2 GA A.A.I.M.S. Montessori 3665 Swiftwater Park 3 Suwanee GA 30024 Gwinnett Ν 6785467700 soldier mini@yahoo.com https://aaimsschool.com/index.html School Drive, Bldg. #1A NONE 4 A.W. Spalding Elementary 4820 University Drive Collegedale ΤN 37315 Catoosa Y 4233962122 mengle@gccsda.com ABC Montessori Academy 5 483 Walker Dr. McDonough 30253 7709579998 admin@montessori.us abc-montessori.org GA Henry Ν for the Brilliant Child 6 ABLE Christian School 78 Old Jackson Rd McDonough 30252 8882351230 none@none.none.none http://www.ableschool.net/ GA Henry Ν Abbeville Christian 7 258 M.L. Tillis Drive Abbeville Out Of State 3345855100 melanie.carlisle@acagenerals.org acagenerals.org AL 36310 Ν Academy Columbia 8 Academics Plus 717 Industrial Pk. Dr. Evans GA 30809 Ν 7063643169 acplus1@aol.com www.academicplusofevans.com Academy of Double H 9 4206 N Arnold Mill Rd Woodstock 30188 Υ 7706304996 barrysinger4@gmail.com GA Cherokee Ranch Academy of Innovation 1399 Thompson Bridge Rd Gainesville 30501 Υ 7705366898 frontoffice@aoiga.com wherelearningtakesflight.com 10 GA Hall Academy of the Oaks 146 New Street Decatur GA 30030 DeKalb Y 4044052173 patriciak@acedemeatlanta.org NONE 11 12 Action Academy 1075 Canter Rd NE Atlanta GA 30324 Fulton Ν 0000000000 None@none NONE Adamsburg Christian 13 5008 County Road 78 0000000000 None@none NONE Fort Payne AL 35967 Chattooga Ν Academy 7135 Hodgson Memorial Savannah http://www.matthewreardon.org/ Advance Academy GA 31406 Chatham Υ 9123559098 pvictor@matthewreardon.org 14 Drive, Suite 10-B 15 Advance Learning Center 3451 Charlie Smith Sr Hwy St. Marys 31558 Camden Ν 9128825327 advancelearning@tds.net advancelearningcenter.org GΔ 16 Ahayah Academy 7254 Parks Trail Fairburn GA 30213 Fulton Υ 8558226942 admin@ahayahacademy.org www.ahayahaacademy.org 4805 Lawrenceville Hwv 17 Al-Falah Academy Lilburn GΑ 30047 Gwinnett Y 6785027211 info@alfalahacademy.com Alfalahacademy.com Suite 220 18 Alexsander Academy 1090 Powers Pl Alpharetta 30009 Fulton Υ 4048395910 smith@alexsanderacademy.org NONE GA Alleluia Community School 2819 Peach Orchard Rd. 7067932346 office@alleluiaschool.org alleluiaschool.org 19 Augusta GA 30906 Richmond γ

**Private Schools- Is your** 

school on the list?



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## **Federal Programs**

- What are Equitable Services?
- Who can receive Equitable Services?
- What services are allowable under Title IA and Title VIII?
- What is needed for private schools to get started participating in Equitable Services?

## **Private School Equitable Services Participation**



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- Federal programs are supported by tax dollars, so <u>children and teachers</u> of nonprofit schools are eligible for Equitable Services.
- Services should be equitable to the public school, not necessarily identical, and designed to meet the needs of the private school students and teachers.
- Services for private school students should begin at the same time as the public schools.

## **Private School Equitable Services Participation**



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- Private schools must provide proof on nonprofit status (not the same as tax exempt status)
- LEAs must verify the physical location of the school
- Schools receive services, not actual funds
- Services should be supplemental

## **Equitable Services Title IA & Title VIII**



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- Title IA- Improving Basic Programs Operated by Local Educational Agencies (LEAs)
- Title IC- Education of Migratory Children
- Title IIA- Supporting Effective Instruction
- Title IIIA- English Language Acquisition, Language Enhancement, and Academic Achievement Act
- Title IVA- Student Support and Academic Enrichment
- Title IVB- 21st Century Community Learning Centers

### Equitable Services Title IA & Title VIII



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Program	
Title IA	Can go outside the district and the state- follows the student regardless of the location of the private school
Title IC	Stays within the district
Title IIA	Stays within the district
Title IIIA	Stays within the district
Title IVA	Stays within the district
Title IVB	Stays within the district- (possible non-LEA exception)



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## Website for Equitable Services



#### **State Ombudsman**



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#### Common Equitable Services Requirements Under Titles I and VIII

New Requirement: Ombudsman To help ensure equitable services and other benefits for eligible private school children, teachers and other educational personnel, and families, an SEA must designate an ombudsman to monitor and enforce ESEA equitable services requirements under both Title I and Title VIII. (ESEA sections 1117(a) (3)(B) and 8501(a)(3)(B).)

What are the roles and responsibilities of an ombudsman?

An ombudsman should serve as an SEA's primary point of contact for addressing questions and concerns from private school officials and LEAs regarding the provision of equitable services under Titles I and VIII. In addition, the ombudsman is required to monitor and enforce the equitable services requirements under Titles I and VIII and, thus, should have a significant role in the State's monitoring process. Furthermore, the ombudsman should ensure that private school officials know how to contact the ombudsman. The following are examples of activities the ombudsman could undertake in fulfilling the roles and responsibilities of the position:

- Serve as a general resource regarding equitable services requirements for both LEAs and private school officials, which may include conducting initial outreach to define the contours of the ombudsman's responsibilities.
- Develop, in partnership with other relevant SEA staff, monitoring protocols applicable to the provision of equitable services and participate in a sample of any monitoring activity.
- Provide technical assistance regarding equitable services requirements for SEA staff administering applicable programs, LEA staff, and private school officials.
- Establish a process for receiving documentation of agreement from LEAs consistent with the consultation requirement that the results of such agreement shall be transmitted to the ombudsman. (ESEA section 1117(b)(1).)
- Participate in the State's Title I Committee of Practitioners (ESEA section 1603(b)) and, as applicable, nonpublic schools working group.

What specific responsibilities does an ombudsman have with respect to monitoring and

#### **Contact Information**

#### Shaun Owen

Director of Consolidated Federal Initiatives State Ombudsman 404-971-0096 sowen@doe.k12.ga.us

#### Statewide Meetings

Statewide Initial Consultation Meetings for Equitable Services FAQs

Participating Private Schools 2018-2019

Completed Statewide Meeting Registrations (As of 10-19-2018)

Sample Template Initial Consultation Invitational Letter to Private Schools (9-13-2018)

Statewide Initial Consultation Meeting Registration

#### Updates

Equitable Services Updates 10-9-18

#### Forms

Equitable Services Consultation Specifics 2018

Equitable Services (Title I and VIII) Complaint, Resolution and Appeal Process

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## Role of the Ombudsman

## Ombudsman



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**Statute - New Requirement** 

To help ensure that private school children, teachers, and other educational personnel receive services equitable to those in public schools, State educational agencies (SEAs) must designate an ombudsman to monitor and enforce Title I and Title VIII equitable services requirements.

ESEA sections 1117(a)(3)(B) and 8501(a)(3)(B) FAQs N-1 through N-5

## Ombudsman



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Guidance - Roles and Responsibilities

The ombudsman should:

- Serve as an SEA's primary point of contact for addressing questions and concerns from private school officials and LEAs regarding the provision of equitable services under Titles I and VIII.
- Monitor and enforce the equitable services requirements under Titles I and VIII and, thus, should have a significant role in the State's monitoring process.
- Ensure that private school officials know how to contact the ombudsman.

## Ombudsman



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**Guidance** - Monitoring and Enforcement

- The primary responsibilities of an ombudsman are to monitor and enforce the equitable services requirements in Titles I and VIII.
- An ombudsman should work with SEA staff administering Title I and programs covered under Title VIII to develop monitoring protocols applicable to the provision of equitable services under each program.

The ombudsman should also serve as the primary point of contact for responding to and resolving any complaints regarding equitable services that the SEA receives under its ESEA complaint procedures.



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## Dispute Resolutions and Complaints

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#### Complaint Form for Equitable Services for Title I and Programs Covered under Title VIII

to Private School Students and Teachers Office of the State Ombudsman

Name of person filing complaint Title/position of person filing complaint	
Name of private school	
Street address of private school	
Email	
Phone number	
Name of Local Educational Agency (LEA) complaint is against	
Street address of LEA	
Contact name	
Email	
Phone number	

Title II and VIII programs (ESEA section 1117 and 8501):

- Title I, Part A Improving basic programs operated by LEAs
- Title I, Part C Education of migratory children
- Title II, Part A Supporting effective instruction state grants
- Title III, Part A English language acquisition, language enhancement, and academic achievement.
- Title IV, Part A Student support and academic enrichment grants
- Title IV, Part B 21st Century Community Learning Centers

What federal statutory or regulatory requirements that apply to equitable services do you feel have been violated? (Please attach any supporting documentation.) Gão

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-45 days for SEA to
respond to complaint
-30 days for private
school to appeal
-90 days for USDE to
respond to appeal

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7 600
Georgia Department of Education
Richard Weeds, Descripte's School Superindendent.

Please describe the issue(s), including dates; and any steps you have taken and people you have contacted from the LEA to resolve the issue and their response(s). Please attach any supporting documentation.

Please describe the solution or the action you feel would resolve this problem.

	Are you willing to participate in the mediation process to try to resolve your concerns? Yes				
		Click here to enter a date.			
	By typing your name, this serves as your electronic signature.	Date			

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This form must be signed and submitted to the Georgia Department of Education and a copy to the local school system. In lieu of mailing, you can email to Shaun Owen @ sowen@doe.k12.ga.us.

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Change to Existing Requirement: Complaint Process for Participation of Private School Children - Time Limit The timeframe that an SEA has for responding to a complaint from parents, teachers, or other individuals concerning violations of ESEA section 8501 regarding the participation by private school children and teachers is 45 days. In addition, the Secretary must investigate and resolve an appeal of an SEA's resolution of a complaint within 90 days.

(ESEA section 8503.)

#### Changes to Existing Requirement: Consultation

The topics subject to consultation have been expanded to include the following:

- · How the proportion of funds allocated for equitable services is determined.
- 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 private school children by pooling funds or on a school-byschool basis.
- · When, including the approximate time of day, services will be provided.
- Whether to consolidate and use funds available for Title I equitable services in coordination with elizible funds available for equitable services under programs covered under section \$501(b) to provide services to eligible private school children in participating programs.
- · The written affirmation that consultation has occurred must provide the option for private school officials to indicate such officials' belief that timely and meaningful consultation has not occurred or that the program design is not equitable with respect to eligible private school children.

(ESEA section 1117(b)(1).)

#### Relevant Statutory, Regulatory, and Guidance References

- Title IX TITLE IX, PART & UNIFORM PROVISIONS SUBPART 1-PRIVATE SCHOOLS Equitable Services for Elizible Private School Students, Teachers, and Other Educational Personnel Non-Regulatory Guidance, Section H and sample form J-16
- 34 C.F.R. 5299.12
- ESSA Sections 1117(b)[6]; 1117(c]2; and 8301(c)6

#### For internal use only-

Date of receipt of form: Click here to enter a date.

Completion of complaint process: Click here to enter a date.

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- What services are provided through Title IA?
- How are allocations determined?
- What is required from private schools for participation in Title IA?

### Title IA-Program Overview



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- Services provided to students that **RESIDE WITHIN** the district's geographical boundaries, but they can follow the student outside the district and/or state
- The students attending private schools must reside in a Title I attendance zone (The student would attend a Title I school in the public school zone)
- Allocations are based on student poverty but services (no direct funding) are delivered to only students most at risk (eligible students) based upon multiple objective, academic selection criteria

### Title IA-Program Overview



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- Services are only for the eligible students, their teacher(s) that teach those eligible students, and the parents of those eligible students
- The Title I equitable services at private schools are the full responsibility of the LEA
- All equitable service decisions are to be reached collaboratively through on-going consultation between the LEA and private school
- Private school equitable services are run like a targeted assistance program

### Title IA-Program Overview



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- Some form of evaluation of student progress must be included (pre/post test, current assessment data, achievement growth on a norm referenced test, etc.) and agreed upon during consultation
- Instructional interventions must be evidence-based and developed in consultation between the LEA and the private school
- Services should **complement the instructional program** of the private school and should **not be a separate instructional program**

#### **Collaboration during consultation is the key!**

### Title IA-Requirements



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- List of all the students attending the private school that reside in the LEA with street addresses by grade level
- Poverty data earns Title I funds and must be gathered
  - Use the same poverty measure the LEA uses from the free/reduced lunch forms (the USDA form cannot be used, but the poverty measure can)
  - Use comparable poverty data from a survey of families
  - Use comparable poverty data from a different source such as a scholarship application
  - Proportionality apply the Title I school's poverty percentage to the private school students residing in the attendance zone of Title I schools

### Title IA-Requirements



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- An LEA in consultation with the private school develops a plan of action for equitable services provided to the private schools which includes:
  - A Comprehensive Needs Assessment (CNA) of the private school's eligible students, their parents, and their teachers
  - Information needed to complete a multiple objective, academic selection criteria worksheet to determine the most academically at-risk students
  - **Pre/post test** information
  - Plan for next year's equitable services in the current school year through ongoing consultation meetings

## **Title IA- Services**



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#### **Examples of Title IA Allowable Equitable Services**

- Extended learning time during the school day
- Supplemental professional learning for eligible teachers
- Technology/Equipment to implement initiatives
- Engage eligible parents in their children's learning (through communication initiatives and building parent partnerships)
- Extended day services, counseling programs, tutoring (before/after school, at home, or on Saturdays)
- Simply providing a school with instructional materials is not allowable- supplies alone would not be a viable program

### **Title IA- Services**



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Services are only for the **eligible students**, the **teacher(s)** that teach the eligible students, and the **parents** of the eligible students

- Services must be reasonable and necessary
- Evidence-based
- Need to demonstrate effectiveness over time



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# Title II, Part A

- What is the general purpose of Title II, Part A?
- How are Title II, Part A allocations determined?
- What other considerations are there for Private Schools participating in Title II, Part A?

# Title II, Part A - Overview



- Purpose: To improve student achievement through effective teachers and leaders
  - particular focus on historically underserved populations
    - Minority, Economically Disadvantaged, Low Achieving
- Governed by specific use of funds listed in the law
  - Professional Learning Activities
    - Pedagogy, Content and Student Support
    - Career Advancement
  - Recruitment and Retention Activities
- Eligible Participants: all teachers (P-12), principals and other school leaders unless otherwise specified by a use of fund in Section 2103
  - Other School Leader defined as individuals in charge of daily instructional and managerial operations in a school

# Title II, Part A- Parameters

- Provision of Equitable Services is governed by:
  - Federal Law, Regulations, Non-Regulatory Guidance
  - State Guidance
- Each funded activity/intervention must:
  - Align to grant purpose (focus on poverty/minority/low academic achievement), Section 2103 Use of Funds and Section 8101 Definitions
  - Adhere to laws and regulations
  - Address the needs of individual students and not the students in general or perceived needs of teachers
  - Reflect consultation conversations between schools and districts (This may vary LEA to LEA and School by School)
- Each funded activity/intervention should supplement and complement the instructional program of the private school

# Title II, Part A- Allocations



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- Allocations for the state are based on Census Bureau Data released annually. Data is based on reports from previous years. All students (public and private school) are included in data that generates allocations for states. Data is usually released in June.
- The Title II, Part A Allocation to LEAs is detailed in law and nonregulatory guidance.
- The Title II, Part A Allocation to private schools is detailed in law and non-regulatory guidance.
  - Per Pupil after deducting administrative costs
  - Administrative costs cover both public and private admin
  - GA restricts to 10% unless a justification can be provided showing costs that exceed 10% are reasonable and necessary.

# Title II, Part A- Allocations



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- The state is required to notify private schools of allocations. GA posts Title II, Part A allocations on the Ombudsman webpage. Because budgets are not approved until after this notification, the allocations listed are NOT final.
- LEAs submit an Equitable Services worksheet with private school allocations based on actual budget. Allocations are not final until budget is approved with actual administrative costs established.
  - During consultation leading up to the allocation LEAs:
    - Must establish geographic location and nonprofit status
    - Must determine private school enrollment K-12 on same day as public school FTE count
    - Must discuss administrative costs
    - Must establish the individual needs of students
    - Must confer on the nature of activities/interventions selected to meet the individual needs of students

# Title II, Part A-Other Considerations



- LEAs should share budget and equitable services information upon request.
- GaDOE recommends that the private school leader or designee involved in consultation have instructional knowledge and access to individual student data and teacher information
- Activities and Interventions may be allowable but may not be reasonable and necessary
- Private Schools must follow LEA travel policy this may vary across LEAs
- Evidence base for applicable PL activities/strategies (Strong, Moderate, Promising, Demonstrates a Rationale) must be established but is not restricted by level

## Title II, Part A-Other Considerations



- Consultation should occur before and during equitable services
- LEA must work with Private School to demonstrate effectiveness of Title II, Part A funded activities/interventions over time and discuss it every year
  - Source documentation will vary LEA by LEA, School by School and by activity/intervention
    - Did it impact teacher/leader practice?
    - Did it impact needs of individual students?
    - Did it impact recruitment and retention outcomes?
- LEAs may not restrict allowable use of funds that align with student needs, etc (equipment, stipends, etc)





- Professional Learning can be prorated
  - Based on availability of funds
  - Based on activities or topics
    - Cannot fund religious activities or topics
    - Cannot fund social activities
- Professional Learning should be ongoing and sustained
  - This may impact ability to fund conferences/meetings
- Professional learning could be completed independently at school or jointly with LEAs
- Funds can be strategically coordinated or leveraged
- Best practices include sharing private school staff lists, public and private school calendars, LEA policies and procedures

## Title II, Part A-Other Considerations



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- Title II, Part A is most often selected by private schools and most often transferred by LEAs into other grant funds to meet student needs. If transferred, the LEA does not have Title II and private schools do not have Title II. This must be shared in consultation, but is not subject to agreement. GA has discussed the impact of this with USDE.

## Title II, Part A-Other Considerations



- Consultation varies by LEA, procedures vary by LEA, needs vary by student. GaDOE cannot regulate for all scenarios. We place a strong emphasis on effective consultation for ensuring practices meet the needs of students and are in compliance with the law. Both LEAs and private schools should acknowledge that practices are unique, but should work towards common understanding and agreement in order to best meet the needs of students.
  - Example: A technology conference may be allowable for one school, partially allowable for another and unallowable for another
  - ESSA states explicitly that professional development is not standalone, one day or short-term workshops. Professional Learning must be sustained, intensive, collaborative, job-embedded, datadriven and classroom-focused.

# Title II, Part A- Resources



- Federal Law: ESSA
- Federal Regulations: EDGAR
  - Focus on 2 CFR Part 200 and 34 CFR Part 76
- Federal Non-Regulatory Guidance:
  - 2016 Fiscal Changes and Equitable Services under NCLB
- State Guidance:
  - Federal Programs Overarching Handbook
  - Title II, Part A Handbook
- Webpages:
  - Federal Programs, Ombudsman and Title II, Part A



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- What services are provided through Title IC?
- How are allocations determined?
- What is required from private schools for participation in Title IC?

## Title I Part C-Program Overview



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- *Title I Part C:* requires SEAs that receive MEP funds to provide special educational services or other benefits on an equitable basis to eligible migrant children who are enrolled in private schools, and teachers located in the geographic area served by the LEA. This must be done after timely and meaningful consultation with appropriate private school officials.
- The allocation are determined on a per pupil basis.
- The SEA and local operating agency have the discretion to determine what number of eligible migrant students attending a private school is too few to serve, so long as this determination is made on an equitable basis.

# **Title | Part C- Services**



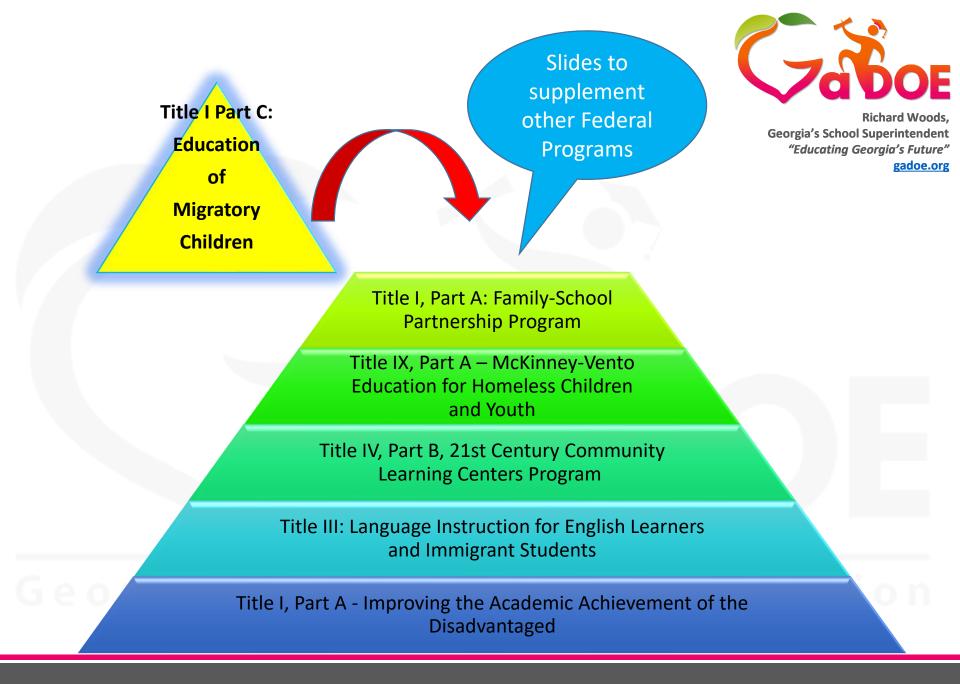
- Student academic and enrichment opportunities
- Homework assistance
- Test preparation
- Supplies, materials and resources
- Instructional software
- Professional learning
- Evidence-based supplemental academic support such as before, during, after-school hours, and weekends
- Summer school opportunities through a school facility based or home base model
- Academic support for preschoolers and out of school youth and drop out students

## **Title I Part C-Requirements**



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- The LEA and/or the SEA identifies and recruit eligible migrant children and youth.
- The LEA identifies the academic needs of their migrant participants (preschool, K12 and out of school youth and or drop out students) through the local CNA.
- Must meet the academic needs of Priority of Service students first.
- The LEA and participating private school must work together to collect and report academic and support services data.







	Contact information
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# **Title IIIA**

- What services are provided through Title IIIA?
- How are allocations determined?
- What is required from private schools for participation in Title IIIA?

### Title IIIA-Program Overview



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Educational services and benefits (not funds) designed & implemented by the LEA in consultation with private school officials, to meet the English language needs of identified K-12 English Learner and Immigrant students, their teachers or other educational personnel, in non-profit nonpublic schools located in the geographic area served by the LEA.

# Title IIIA-Program Overview



- All services and activities should be evidencebased and demonstrate effectiveness to increase EL students' English language proficiency and academic achievement.
- Title III, Part A services provided to private schools' ELs, must be secular, neutral, and non-ideological.
   NOTE: The number of Title IIIA-eligible private school students is annually reported in Student Record by LEAs and is included in the annual Title III Part A LEA allocations.

### **Title IIIA- Services**



- Participation of teachers of ELs (or other educational personnel) in LEA-sponsored professional learning (PL) opportunities or PL organized specifically to meet the needs of private school teachers
- Supplemental English language development-focused instruction, including tutoring for EL students (before, during, after-school hours, weekends, summer school)
- Participation of ELs in LEA English language development (ELD) summer school for ELs

# **Title IIIA- Services**



- Purchase of supplemental ELD instructional materials/supplies (LEA maintains on LEA-Title IIIA inventory)
- Administration of ELP assessment for identification and/or evaluation of effectiveness of services.
- An LEA in consultation with private school officials, determines the appropriate Title III-A services based on the needs of the identified private school EL students, their teachers or other educational personnel, and the amount of funds available for such services.

### **Title IIIA- Services**



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- Services should be designed to meet the language needs of the EL students and to supplement the educational services provided by the private school. If needs are different from those of public school students, the LEA, in consultation with private school officials, must develop a separate program design that is appropriate for their needs.
- Services may be provided directly by the LEA or by a third-party contractor who is independent of the private school and any religious organization.

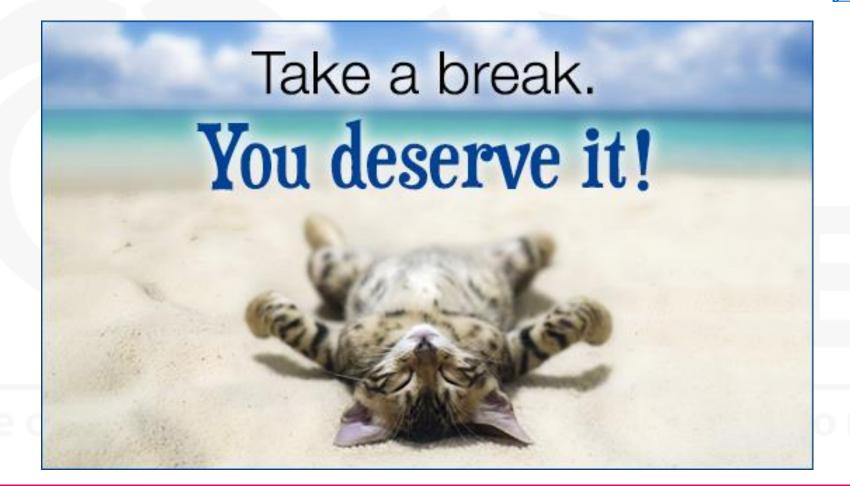
### Title IIIA-Requirements



- Administration of English language proficiency (ELP) assessment for identification and/or for the purpose of annually evaluating the effectiveness of services (may include testing materials, teacher testing training, and stipends to teacher to administer assessments).
- LEAs will be provided with a list of ELP Assessment Options from which to choose to use with private school potential and identified ELs, which will include the WIDA MODEL assessment, though not the WIDA ACCESS for ELLs<sup>®</sup> 2.0.



### **Break Time**





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# **Title IVA**

- What services are provided through Title IVA?
- How are allocations determined?
- What is required from private schools for participation in Title IVA?

Dawna Hatcher Title IV, A Education Program Specialist Office of Federal Programs Georgia Department of Education <u>dhatcher@doe.k12.ga.us</u> 404-293-1490



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#### **Focus Areas**

# Title IV, A as a funding source



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LEA receives \$30,000 or more, must budget –

- ≥ 20% for activities to support well-rounded educational opportunities
- ≥ 20% for activities to support safe and healthy students
- A portion of funds for activities to support effective use of technology (≤15% rule on technology infrastructure as described in ESSA section 4109(b))

ESSA, Title IV-A, Section 4106 (e)(2)(C-E)

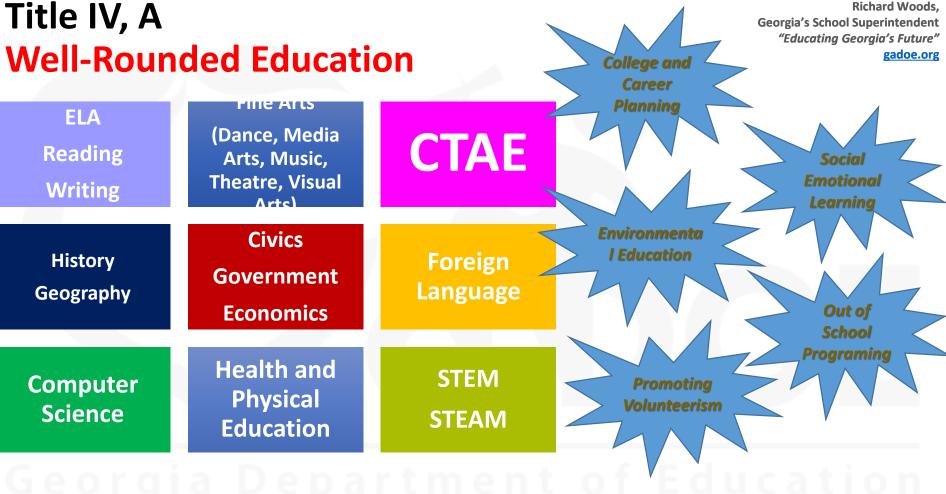


Title IV, A Well-Rounded Education

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October 2018



Title IV, A Safe and Healthy Students

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#### Title IV, A

#### Safe and Healthy Students Improving school conditions for student learning.

SSAE program funds may be used for any program or activity that fosters safe, healthy, supportive, and drug-free school environments, including direct student services and professional development and training for school staff.



Title IV, A Effective Use of Technology

More than the core

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#### **Effective Use of Technology**

Increasing effective use of technology to improve academic achievement, academic growth and digital literacy

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#### • Expand growth opportunities to disadvantaged students via equity of access to--

- High quality learning materials
- Field experts
- Personalized learning
- Tools for planning future education

#### Increase capacity for educators to--

- Create blended learning programs\*
- Have access to content/resources
- Utilize tech to increase engagement of EL and communicate with parent/caregiver who lack English proficiency

#### Professional Development for educators

- Sustained/Intensive/Collaborative/Job-embedded/Data Driven/Classroom focused
- Learning to use tech effectively (includes STEM/STEAM activities)
- Support and mentoring for tech users

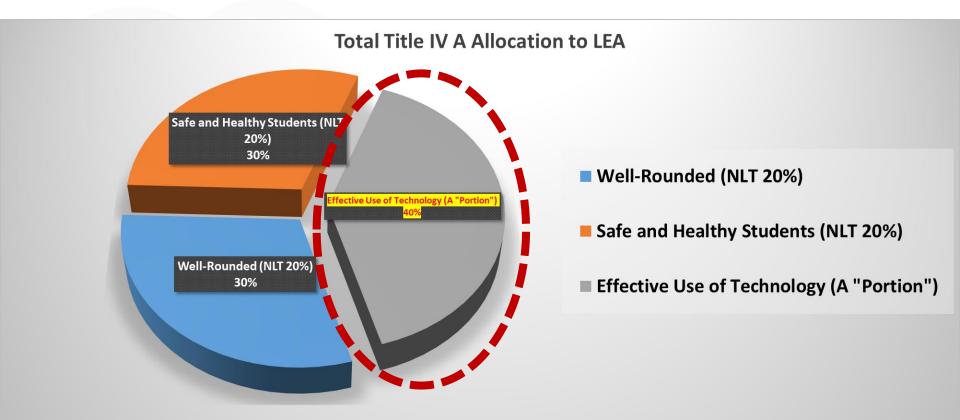
#### Infrastructure\*\*

- Devices/Equipment
  - Computers/laptops/handheld/printers/keyboards/mice/headphones/etc.

#### Georgia Department of Education

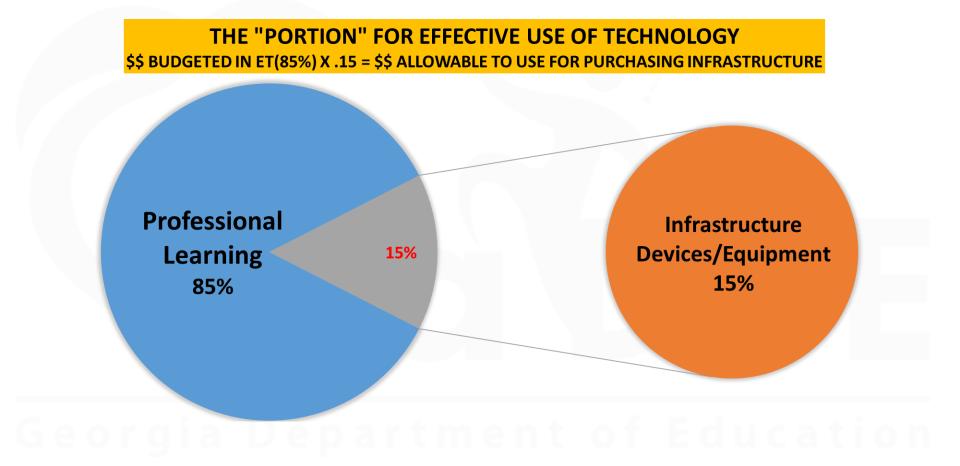
#### September 2018







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#### Collaboration and Coordination

- Title IV A services provided to students attending a private school WITHIN the district's geographical boundaries
- Allocations are earned on each student in the school (minus pre-k)
- Budgeted line items MUST allow district to maintain statute minimum requirements and spending caps
- Follow Budget descriptive narrative requirements
  - Correctly identified in appropriate Focus Area (WR/SH/ET)
  - Evidence-Based level annotation (\*\*Logic Model)
  - Name of Activity/program/event/service
  - List of supplies/materials/resources
  - Expected time of delivery

18 e b a r t m e n t o t e d u c a t l o n

October 2018





### **Examples** Needs-based and Supplemental

Professional Training/Development

Conferences

Travel

Fees

Substitutes

Resource Materials

Supplies

Instructional Software
Screeners
Coaches
Contracted Services
Train the Trainer
Guest Speakers
Tutoring Services



### SSAE Title IV, A Community Site Online Forum

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- Log into the community forum using your official school email address.
- Adhere to posted guidelines.
- If you have questions/comments or are unable to log in, please contact Dawna Hatcher.

### http://ssae.gadoe.org



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# **Title IVB**

- What services are provided through Title IVB?
- How are allocations determined?
- What is required from private schools for participation in Title IVB?

# Title IVB-Program Overview

- Funded through the US Department of Education (US ED)
- Managed by the Georgia Department of Education
- 21<sup>st</sup> CCLC Programs consist of local school districts, schools, Non-LEAs (Local Educational Agencies); such as public or private organizations, faithand community-based organizations
- Reimbursable grant
- 21<sup>st</sup> CCLC Programs will initiate and manage consultation with private schools within the geographical area of the service school
- Private school can participate in services offered but will not receive an allocation
- Transportation is not provided
- Five years grant period contingent upon the availability of continued funding and evidence of growth and progress as documented in the annual evaluation report and the 21<sup>st</sup> CCLC Annual Performance Reporting (APR) system



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## Title IVB-Program Overview



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Provide federal funds to establish or expand community learning centers that operate during **out-of-school hours** and that have **three** required specific purposes:

 To provide opportunities for academic enrichment and tutorial services to help students meet academic standards;

2) To offer students a broad array of additional services, programs, and activities that reinforce and complement the regular academic program; and

3) To offer families of 21st CCLC students opportunities for active and meaningful engagement in their child's education

# **Title IVB- Services**



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- Student academic and enrichment; tutoring
- Homework assistance
- Test preparation; Credit recovery
- Technology
- Archery, physical activities, sports, art, painting, field trips
- Healthy life styles; nutrition
- STEM/STEAM such as Lego robotics
- Family engagement activities such as parental involvement and family literacy
- Drug and violence prevention programs and counseling programs;
- Career readiness skills
- Summer school

## Title IVB-Requirements



- Actively participate in the consultation meetings initiated and managed by 21<sup>st</sup> CCLC programs
- Provide the names of the private school officials who should be included in the consultation process along with their roles and levels of authority.
- Provide input in the development of a timeline for consultation; offer suggestions regarding program design, implementation, and evaluation.
- Provide documentation to identify students who are eligible. Such documentation might include, but not be limited to, data indicating the academic needs of students.
- Complete any appropriate forms needed to ensure the delivery of equitable services.



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## **Title IVB**



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- Private schools may apply for this grant and are likewise held to ended
   the standard requirements of equitable participation and timely
   and meaningful consultation.
- Private school subgrantees must provide equitable access to the program for all public school students and their families who reside in the specific attendance zone of the public school to be served by the proposed program.
- The application FY20 Request for Proposal (RFP) can be found on the GaDOE 21<sup>st</sup> CCLC website under the 'FY20 Request for Proposal (RFP)' tab (<u>http://www.gadoe.org/School-</u> <u>Improvement/Federal-Programs/Pages/21st-Century-</u>
- Community-Learning-Centers.aspx ).
- Application submission deadline: January 30, 2019 at 5:00 PM.







### Georgia D

# **Agenda- Session 2**



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- 1:00-1:30- Administrative caps, Transferability, W-9 and 1099, Carryover, Timelines, Due Dates
- 1:30-2:00- Ongoing Consultation (Before, During, After)
- 2:00-2:15- Break
- 2:15-2:45- Resource for Equitable Services
- 2:45-3:25- Scenarios- Equitable Services
- 3:25-3:50- Online Platform
- 3:50-4:00- Wrap Up and Close Session 2



.....

# Administrative Costs and Caps

- What are administrative caps?
- Which programs have administrative caps?
- When are administrative costs and caps discussed?
- What are some of the services provided by administrative costs?



# **Administrative Caps**

ESSA Program	Maximum Percentage for Administration
Title I, Part A - Improving the Academic Achievement of the Disadvantaged	<u>≤</u> 10%
Title I, Part C – Education of Migratory Children	<u>≤</u> 2%
Title II, Part A – Supporting Effective Instruction	<u>≤</u> 10%
Title III, Part A – Language Instruction for English Learners and Immigrant Students	<u>≤</u> 2%
Title IV, Part A - Student Support and Academic Enrichment	<u>&lt;</u> 2%
Title IV, Part B - 21st Century Community Learning Center (CCLC)	<u>≤</u> 10%

# **Administrative Costs**



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- Meeting regarding the CNA and planning
- Ongoing consultation
- Collecting and analyzing student poverty calculations and academic data
- Program planning and evaluation
- Submitting CLIP, Con App reports and budget calculations for approval
- Recruiting and hiring PS staff
- Scheduling staff
- Payroll reports
- Ongoing monitoring of program (instructions Pl and family engagement

# **Administrative Costs**



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- Conducting staff evaluations
- Selection of evidence based interventions and materials
- Processing POs and contractual agreements following procurement polices and internal controls
- Purchasing, dissemination and maintaining an inventory of resources, equipment and materials
- Attending GaDOE training specific the PS programs
- Secretarial and bookkeeping support
- Ongoing communication with Private school staff and parents
- Parent, staff and student surveys



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# **Transferability**

- What is transferability?
- Which programs can be transferred?
- When is transferability discussed?
- How can transferability impact Equitable Services?





#### Resources

- Nonprofit Status and Equitable Services
- Overarching Requirements for All Federal Programs - Pages 40-42 and 52-69
- · The Use of the W9 and 1099
- Transferability
- Private School Data Collections Includes the

Following Resources:

- DE1111 Form Updated 9/18/17
- Private School Directions
- Private School Data Collection Webinar -
  - 9/15/17
- Private Schools
- Title IVA
- FY18 Title IIA Planning for Funding Essential

Questions



### Education

## **Transferability of Funds Between Federal Programs**



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Page 57 of the Federal Programs Handbook

Under ESSA, LEAs may transfer funds they receive by formula under certain programs to other programs to better address local needs.

The ESSA amended the transferability authority by changing the programs from and to which an LEA may transfer funds and removing limits on the amount of funds that may be transferred.

## **Transferability of Funds Between Federal Programs**



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Page 57 of the Federal Programs Handbook

An LEA may transfer funds, to better address local identified needs, <u>from</u> the following programs:

- Title II, Part A Supporting effective instruction state grants
- Title IV, Part A Student support and academic enrichment grants

### ESEA section 5103(b)(2)

## **Transferability of Funds Between Federal Programs**



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Page 57 of the Federal Programs Handbook

An LEA may transfer funds, to better address local identified needs, <u>to</u> the following programs:

- Title I, Part A Improving basic programs operated by LEAs
- Title I, Part C Education of migratory children
- Title I, Part D Prevention and intervention programs for children and youth who are neglected, delinquent, or at-risk
- Title II, Part A Supporting effective instruction state grants
- Title III, Part A State grants for English language acquisition and language enhancement
- Title IV, Part A Student support and academic enrichment grants
- Title V, Part B Rural education

ESEA section 5103(b)

# Transferability...Impact on Equitable Services



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Page 57 of the Federal Programs Handbook

- Can impact the allocations of private schools
- Can impact the services provided to private schools
- Proportionate share can not be held out for Equitable Services
- LEA and private schools must mirror regarding transferability



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# W-9 and 1099





#### Resources

Website

- Nonprofit Status and Equitable Services
- Overarching Requirements for All Federal Programs - Pages 40-42 and 52-69
- The Use of the W9 and 1099
- Transferability
- Private School Data Collections Includes the

Following Resources:

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- Private Schools
- Title IVA
- FY18 Title IIA Planning for Funding Essential

#### Questions



### Education



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#### The Use of the W-9 and 1099 in the Provision of Equitable Services to Private Schools

In the course of providing equitable services to private schools, LEAs may need to issue payments, including reimbursements, to private school employees who are not employees of the LEA. In alignment with ESSA allowable use of funds, this may include, but is not limited to, professional learning stipends, additional compensation for providing mentoring services, professional learning registration reimbursement, and travel reimbursement.

In accordance with questions F-5 and F-6 of USED's 2009 Non-Regulatory Guidance on Title IX, Part E Equitable Services for Eligible Private School Students, Teachers, and Other Educational Personnel, LEAs "must always maintain control of the program funds" and "only the LEA may obligate and expend federal funds on behalf of private school students and teachers." LEAs may not reimburse a private school.

Payments, including reimbursements, to any non-employee require a tax identification number. For individuals, this is a social security number. Further, many financial accounting systems require the input of a tax identification number prior to any payment. Some LEAs collect this information from individuals requiring payment through a Form W-9; others collect it through a local form that requests the same information.

The IRS 2016 Publication 535 defines a "reasonable period of time" for a travel reimbursement as "60 days after the expenses were paid or incurred." Each individual LEA should have written procedures for processing reimbursements. In these procedures, LEAs must establish at which point the LEA will classify and report the reimbursement as taxable income using the Form 1099-MISC. Procedures may vary LEA to LEA.

LEAs should have established procedures regarding reimbursements (including travel reimbursements) that are applied consistently to federal and non-federal funds, and that are inclusive of employees and non-employees such as private school employees. When developing procedures, LEAs should consider the provision of equitable services to ensure procedures are reasonable in nature. LEAs should also consult their local board attorney(s), human resources department, and/or finance office when developing these procedures.

LEAs are charged with maintaining the confidentiality of data such as social security numbers under *The Privacy Act of 1974* (5 U.S.C. § 552a) and O.C.G.A. § 50-18-72(a). LEAs must protect all personally identifiable information collected, including information obtained from private school employees.

> Georgia Department of Education December 22, 2017 • Page 1 of 1

# The <u>Use of the W-9</u> and 1099 in the Provision of Equitable Services to Private Schools

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# Scenario: W-9 and 1099



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GaDOE received an inquiry asking for clarification as to whether or not W-9 can be required of private school teachers. There was concern both about protecting personally identifiable information (PII), and about how this might influence private school audits.

### Key Take-aways

- What is the purpose of both forms?
- How do LEAs protect personally identifiable information?
- What does the GaDOE guidance say?
- What should LEAs take away as next steps?



#### Contact Information

#### Shaun Owen

Director of Consolidated Federal Initiatives State Ombudsman 404-971-0096 sowen@doe.k12.ga.us

#### Updates

Overarching Requirements for All Federal Programs - Pages 50-66

The Use of the W9 and 1099

Transferability

#### **Common Equitable Services Requirements Under** Titles I and VIII

New Requirement: Ombudsman To help ensure equitable services and other benefits for eligible private school children, teachers and other educational personnel, and families, an SEA must designate an ombudsman to monitor and enforce ESEA equitable services requirements under both Title I and Title VIII. (ESEA sections 1117(a) (3)(B) and 8501(a)(3)(B).)

What are the roles and responsibilities of an ombudsman?

An ombudsman should serve as an SEA's primary point of contact for addressing questions and concerns from private school officials and LEAs regarding the provision of equitable services under Titles I and VIII. In addition, the ombudsman is required to monitor and enforce the equitable services requirements under Titles I and VIII and, thus, should have a significant role in the State's monitoring process. Furthermore, the ombudsman should ensure that private school officials know how to contact the



**State Ombudsman** 





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#### The Use of the W-9 and 1099 in the Provision of Equitable Services to Private Schools

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LEAs should have established procedures regarding reimbursements (including travel reimbursements) that are applied consistently to federal and non-federal funds, and that are inclusive of employees and non-employees such as private school employees. When developing procedures, LEAs should consider the provision of equitable services to ensure procedures are reasonable in nature. LEAs should also consult their local board attorney(s), human resources department, and/or finance office when developing these procedures.

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> Georgia Department of Education December 22, 2017 • Page 1 of 1

# The <u>Use of the W-9</u> and 1099 in the Provision of Equitable Services to Private Schools

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#### Federal Regulations - 2 CFR §200.474(b)

The LEA must have written travel procedures and a method for ensuring that charges are reasonable and consistent with the written travel policies. In the absence of LEA procedures, Federal rates and policies apply. The purpose of travel must be allowable.

#### O.C.G.A. § 20-2 -167(b),(c); 20-2- 272(b) SBOE Rule 160-5-2-.23

(1) REQUIREMENTS. (a) Local units of administration shall comply with procedures prescribed in the Financial Management for Georgia Local Units of Administration, copies of which are available from the department. (b) Local units of administration shall adhere to generally accepted governmental accounting principles.

Financial Management for Georgia Local Units of Administration Section V – Other Information Statewide Travel Regulations

"Annually the Governor's Office of Planning and Budget and the State Accounting Office conduct a review of statewide travel regulations that all state employees must follow. In addition, personnel from local units of administration (LUAs) must follow these regulations. "Personnel" as used in these regulations is defined as persons governed by the rules and regulations of LUAs."



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#### Statewide Travel Policy – Updated 11.16.17 (pg. 8)

D. Internal Revenue Service Requirements

In order for travel advances and reimbursements of travel expenses to be excluded from a traveler's taxable income, the State's travel policies must meet the Internal Revenue Service (IRS) requirements for an "Accountable Plan". In general, the Statewide Travel Policy has been developed with the IRS Regulations as its primary payment framework. Accordingly:

 Advances and reimbursements must be reasonable in amount, must be made for travel only, must be in line with actual costs incurred and must be within Policy limitations. Expenses that do not comply with Policy guidelines will be the obligation of the individual that incurred the expense.

State policy requires that travelers <u>submit</u> expenses via the TTE system (or via manual expense reimbursement forms if not using the TTE system) substantiating the amount, date, use and business purpose of expenses, ideally within 10 days, **but no later than 45 calendar days** after completion of the trip or event. Expenses submitted in excess of 60 calendar days may not be reimbursed. (See Section 7.2 for further guidance.) Expenses submitted more than 60 calendar days after completion of the trip or event, if reimbursed, should be included in the traveler's IRS Form W-2 as taxable income.



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# Carryover

- What is carryover?
- What are the changes in carryover related to Equitable Services?





- 8501(a)(4)(B); Title VIII Fiscal Changes (2016) N-6, N-7
- New Requirement: Obligation of Funds
- Funds allocated to an LEA for educational services and other benefits to eligible private school children, teachers and other educational personnel, and families must be obligated in the fiscal year for which the funds are received by the LEA.
- (ESEA sections 1117(a)(4)(B) and 8501(a)(4)(B).)
- However, there may be extenuating circumstances in which an LEA is unable to obligate all funds within this timeframe in a responsible manner. Under these circumstances, the funds may remain available for the provision of equitable services under the respective program during the subsequent school year. In determining how such carryover funds will be used, the LEA must consult with appropriate private school officials.



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# Timeline

### **FY19 Private School Participation**



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### Action Steps and Timeline

 Phase 1 (Fall): Completion of prior year's program; begin current year's program; Initial Consultation & Notification of Intent for the following year

- Phase 2 (Spring): Monitor current year's program planning & program development, ongoing consultation sessions
- Phase 3 (School Year): Implementation and evaluation with ongoing consultation sessions
- Phase 4 (End of Grant): Final feedback Confirmation of receipt of satisfactory equitable services that began at the time requested and which were agreed upon by both parties

## **FY19 Private School Participation**



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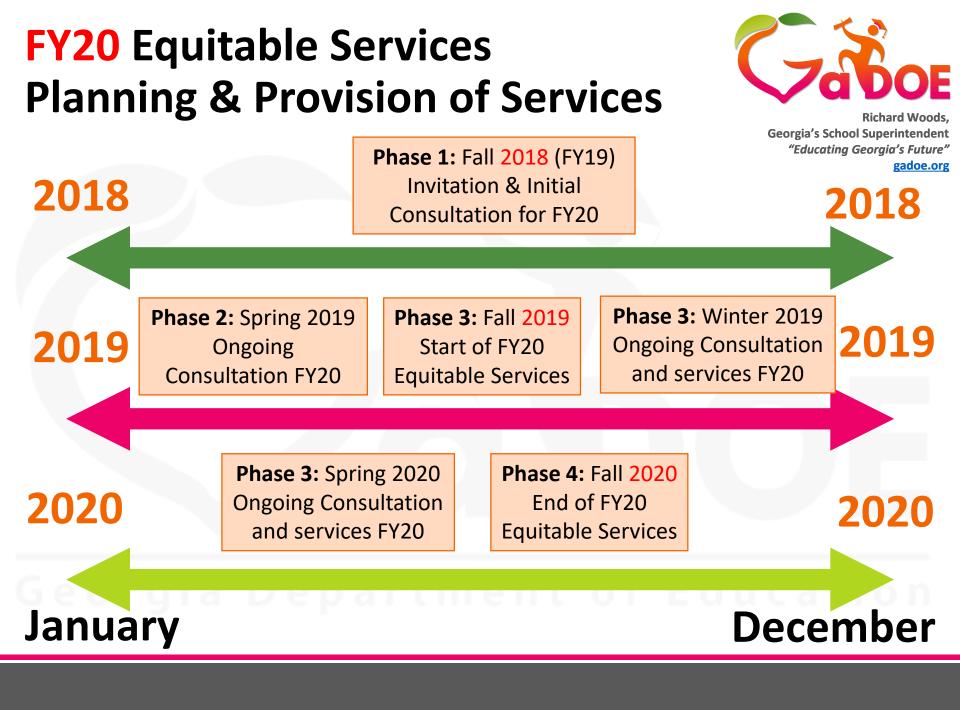
- Action Steps and Timeline, continued
  - August Begin private school services for FY19 (Services Already planned in FY18)
  - September 30 The end of the FY18 grant period 2018; The private school confirms receipts of equitable services for FY18- program evaluation
  - Mid-Late Fall 2018 The District contacts all private schools eligible for equitable services in FY20
  - Late Fall-Winter 2018 The District/State hosts an information session about equitable services and begins consultation process for FY20

## **FY19 Private School Participation**



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- Action Steps and Timeline, continued
  - Spring-Summer 2019 The District and participating private school engage in ongoing consultation to determine needs and develop a program for the provision of equitable services in FY20
  - Private School Proportionate Share Calculations are provided by GaDOE
  - The following school year 2019-2020 The District and participating private school engage in ongoing consultation to monitor program implementation and effectiveness (adjusting as needed). The FY20 private school program should start at the same time as the public school





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- What are the due dates for Equitable Services?
- What are the changes in due dates for Equitable Services?



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# All LEAs

## **Previous Due Dates**



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- 12/15/17- Private school Intent to Participate for the 2018-2019 school year
- 12/15/17- Private school allocation numbers-
  - Title IA- Poverty numbers
  - Title IIA- Total number of students minus pre-K
  - Title IIIA- English Learners
  - Title IVA- Total number of students minus pre-K
- 7/31/17- Form B- Part 1: Timely and Meaningful Consultation Affirmation – Ongoing Consultation
- 10/1/18- Form B- Part 2: Equitable Provision of Services

Participation information due 8 months prior to the start of school.

3 Data Collection Periods

> Paper Forms

## **Due Dates**





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- 6/30/19- Private School Initial Consultation and Notification of Intent for 2019-2020 Provision of Services (Oct 2020)
  - Submit one form for each private school that will be participating OR
  - Submit one form that states no private schools will be participating
- <u>6/30/19</u>- <u>IF</u> private schools will be participating in equitable services, submit data for each participating private schools

3 Data Collection Periods

Electronic Submissions

Participation information due 2 months prior to the start of school.

#### Form A for the 2019-2020 School Year

#### Private School Initial Consultation and Notification of Intent for 2019-2020 Provision of Services

Affirmation	of Initial	Consultation	and Intent	Notification
-------------	------------	--------------	------------	--------------

Local Education Agency (LEA)	
Private School	
Private School Address	
Private School Phone	Email:
Private School Official	
LEA Federal Program Official	Phone:

Federal Program(s) offering services to Private Schools (Place an "X" in each program where the Private School listed above intends to consult with the LEA on possible services):

Title I A 🔄 Title II A 🛄 Title III A 🛄 Title I C 🔜 Title IV A 🛄 Title IV B

Directions: Both School Officials (private and public) must initial under either YES or NO for each statement. Both School Officials must also sign and date this document, which must then be scanned and attached to the Consolidated Application in the Portal no later than <u>June 30, 2018</u> (even if no private school participation – See Part 2 below).

#### Part 1: Timely and Meaningful Consultation Affirmation – Initial Consultation

Official	Yes	No	Consultation Requirements (ESSA Sections 1117 and 8501)	
Private School			The initial consultation for the 2019-2020 school year has occurred between the LEA	
			and Private School. Date(Should take place prior to December 15 <sup>th</sup> )	
			Consultation addressed:	
			<ul> <li>How the proportion of funds allocated for equitable services is determined,</li> </ul>	
			including administrative costs for implementing equitable services.	
			<ul> <li>Whether the agency, consortium, or entity responsible for providing equitable</li> </ul>	
			services will provide those services directly or through a separate government	
Public School			agency, consortium, or entity, or through a third-party contractor.	
r conciscion			<ul> <li>Whether to provide equitable services to eligible private school children by</li> </ul>	
			pooling funds or on a school-by-school basis.	
			<ul> <li>When, including the approximate time of day, services will be provided.</li> </ul>	
			<ul> <li>Whether to consolidate and use funds available for Title I equitable services in</li> </ul>	
			coordination with eligible funds available for equitable services under programs	
			covered under section 8501(b) to provide services to eligible private school	
			children in participating programs.	



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## Form A for 2019-2020



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NOTE- For the 2019-2020 School Year, GaDOE will be switching to an online platform for entering information and participation related to Equitable Services. This form will be used for private schools to notify LEAs of their interest to participate in Equitable Services. Final participation and allocation numbers will be entered into the online platform with the date being moved from December 15, 2018 to June 30<sup>th</sup>, 2019. Do not submit this form into the Con App as has been the process the past two years.

#### Form A for the 2019-2020 School Year

#### Part 2: Notification of Intent to Participate in 2019-2020 Services



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This checked box indicates that the LEA has no private schools participating in equitable services in 2019-2020. Official Yes No Intent Notification (ESSA Section 1117 and 8501) The Private School intends to continue consultation and participate in 2019-2020 Private School equitable services. It is the responsibility of the LEA to design, develop, and implement the services provided to the private school students, after on-going consultation with Public School the private school. Signature Private School Official Printed Name and Title of Private School Official Date Signature Public School Official Printed Name and Title of Public School Official Date Comments:



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# **LEAs with** Participating **Private Schools**





#### School Year

#### Private School Participation in the 2017-2018 School Year

Affirmation of Timely/Meaningful Ongoing Consultation and Equitable Services

Local Education Agency (LEA)	
Private School	
Private School Address	
Private School Phone	
Private School Official	
LEA Federal Program Official	Phone:

Federal Program(s) offering services to Private School (Place an "X" in each program where the Private School intends

#### to consult with the LEA

Title I A 🔲 Title II A 🛄 Title III A 🛄 Title I C 🛄 Title IV A 🛄 Title IV B

(Title IA- Improving basic programs operated by LEAs) (Title IIA- Supporting effective instruction)

(Title IIIA- English language acquisition, language enhancement, and academic achievement) (Title IC- Education of migratory children) (Title IVA- Student support and academic enrichment) (Title IVB- 21<sup>st</sup> Century Community Learning Centers)

**Directions:** Both School Officials (private and public) must initial under either YES or NO for each statement. Both School Officials will initial, sign, and date this document following the ongoing consultation AND the equitable services implementation. This document must be scanned and attached to the Consolidated Application by the due dates listed for Part 1 and Part 2 below.

!	Part 1: Timely and Meaningful Consultation Affirmation – Ongoing Consultation – Due date: December 15, 2018					
	Official	Yes	No	Consultation Requirements (ESSA Sections 1117 and 8501)		
	Private School			Timely and meaningful consultation occurred regarding the needs and services of eligible children		
	Public School			and their teachers and families. Consultation Dates		
	Private School			The local education agency gave due consideration to the views of the private school official.		
	Public School			The local education agency gave due consideration to the views of the private school official.		
	Private School			The program design/provision of services agreed upon by the local education agency and private		
	Public School			school is equitable.		

Part 2: Equitable Provision of Services (If equitable services were then provided in FY18, the due date for Part 2 is by December 15, 2018, after the 2017-2018 grant period.)

	Official	Yes	No	Consultation Requirements (ESSA Sections 1117 and 8501)	
	Private School			Services began at the time requested and agreed upon by the private school official. Date	
	Public School			Services began at the time requested and agreed upon by the private scrool official. Date	
	Private School			The local education agency gave due consideration to the views of the private school official.	
	Public School				
	Private School			Satisfactory services were provided during the school year.	
V	Public School				
	Signature Private School Official Parks: Parka				
	Printed Na	Printed Name and Title of Private School Official Part 1: Part 2:			

 Printed Name and Title of Private School Official
 Part 1:
 Part 2:

 Date
 Part 1 Date:
 Part 2 Date:

 Signature Public School Official
 Part 1:
 Part 2:

 Printed Name and Title of Public School Official
 Part 1:
 Part 2:

 Date:
 Part 1:
 Part 2:

 Part 1:
 Part 1:
 Part 2:



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# Cross-Functional Monitoring

- What is Cross-Functional Monitoring?
- What is monitored for Equitable Services?



1. ESSA:	1. ESSA – evidence shall include:
<ul> <li>Evidence that the LEA provides for the equitable provision of services to eligible private school children, their teachers, principals and other school leaders</li> </ul>	<ul> <li>a. Copies of all DE1111 forms submitted to LEA for the FY18 and FY19 school years (Title I, Part A and Title III, Part A)</li> <li>b. Copies of private school invitations for FY18 and FY19 inviting private school participation. (All Federal Programs)</li> <li>1. Title I – Invitations to schools serving students whose residence is within Title I eligible attendance areas</li> <li>2. Title II, Title III and Title IV – Invitation to schools whose physical location is within geographic boundaries</li> </ul>
<li>b. Evidence that LEA provided initial consultation to private schools on their participation</li>	<ul> <li>Evidence that initial consultation has occurred between the LEA and private school officials or its representatives regarding services for private school children prior to the LEA making any decision. (All Federal Programs)</li> </ul>
c. Evidence that participating private schools	ONLY FOR LEAS WITH PARTICIPATING PRIVATE SCHOOLS
engage in ongoing consultation around the equitable provision services ESEA: Sec. 1117 and 1120; Sec. 2102(b)(2)(E); Sec.	<ul> <li>d. The written affirmation and documentation of on-going consultation from officials of private school or a representative. (Al Federal Programs). In addition to the required affirmation form(s), consultation documentation may include:         <ol> <li>Meeting agendas and/or minutes w sign-in rosters</li> </ol> </li> </ul>
3501(a)(5); Sec. 8501(c); Sec. 4106(e)(2)(B); Sec. 8501(a)(5);	2. Results of assessment of private school student, teacher and leader needs
Sec. 8501(c); 34 CFR Part 200.62-200.67; 34 CFR Part	3. Evidence of planning and budgeting
<u>200.77 (f)</u>	4. Provision of services, programs, materials and resources
USDE Non Begulatamy Cuidance Title IV Part E (2000).	5. Evaluation of programs and services for effectiveness
USDE Non-Regulatory Guidance Title IX, Part E (2009): D-11 Consultation Documentation; D-12 Consultation	6. If applicable, evidence of adequately addressing problems and complaints raised by private school officials
Meeting Notes; D-16 Program Design; D-17 Timely and	e. Evidence that the LEA regularly supervises the provision of Title I, and Title VIII (IC, IIA, IIIA, IVA, IVB) services to
Meaningful; D-18 Ongoing Consultation; E-2 Private	private schools.
School Status	f. Evidence that the LEA has documentation that each participating private school has non-profit status.

3. The LEA has procedure(s) to ensure that it meets	3. Evidence shall include:
reservation requirements annually.	a. The LEA has procedures to ensure that it has correctly calculated the amount of funds for the following required set-asides:
ESEA: Sec. 1113; 34 CFR Sec. 200.70; 200.71	Parent and Family Engagement, Homeless, Neglected and Delinquent, Private School Proportionate Share.
	b. Written Procedures for calculating Parent and Family Engagement Carryover and accompanying calculation worksheet (if
	applicable).



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## Timely and Meaningful Ongoing Consultation

- What is Ongoing Consultation?
- When should Ongoing Consultation begin?
- What are the components of Timely and Meaningful Ongoing Consultation?



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- (A) how the children's needs will be identified;
- (B) what services will be offered;
- (C) how, where, and by whom the services will be provided;(D) how the services will be academically assessed and how the results of that assessment will be used to improve those services;
- (E) the size and scope of the equitable services to be provided to the eligible private school children, the proportion of funds that is allocated under subsection (a)(4)(A) for such services, and how that proportion of funds is determined;
- Georgia Department of Education



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(F) the method or sources of data that are used under subsection (c) and section 1113(c)(1) to determine the number of children from low-income families in participating school attendance areas who attend private schools; (Title IA only) (G) how and when the agency will make decisions about the delivery of services to such children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with potential third-party providers;



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(H) how, if the agency disagrees with the views of the private school officials on the provision of services through a contract, the local educational agency will provide in writing to such private school officials an analysis of the reasons why the local educational agency has chosen not to use a contractor;
(I) whether the agency shall provide services directly or through a separate government agency, consortium, entity, or third-party contractor;



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(J) whether to provide equitable services to eligible private school children—

(i) by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(A) based on all the children from low-income families in a participating school attendance area who attend private schools; or

(ii) in the agency's participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(A) based on the number of children from low-income families who attend private schools;



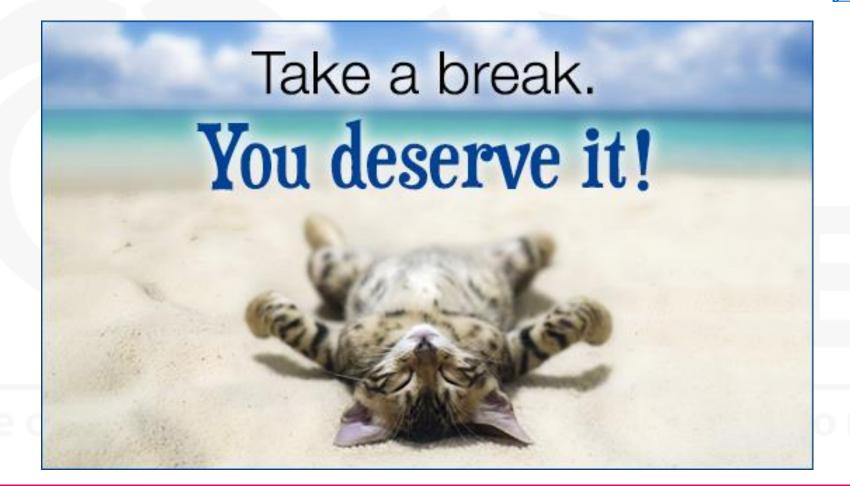
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(K) when, including the approximate time of day, services will be provided; and

(L) whether to consolidate and use funds provided under subsection (a)(4) in coordination with eligible funds available for services to private school children under applicable programs, as defined in section 8501(b)(1)to provide services to eligible private school children participating in programs.



## **Break Time**





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## Resources

- What resources are available for Equitable Services?
- Where are these resources located?



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- Have you been receiving Equitable Services updates?
- If not, please contact Shaun Owen.

## Updates

#### **State Ombudsman**

#### Common Equitable Services Requirements Under Titles I and VIII

New Requirement: Ombudsman To help ensure equitable services and other benefits for eligible private school children, teachers and other educational personnel, and families, an SEA must designate an ombudsman to monitor and enforce ESEA equitable services requirements under both Title I and Title VIII. (ESEA sections 1117(a) (3)(B) and 8501(a)(3)(B).)

What are the roles and responsibilities of an ombudsman?

An ombudsman should serve as an SEA's primary point of contact for addressing questions and concerns from private school officials and LEAs regarding the provision of equitable services under Titles I and VIII. In addition, the ombudsman is required to monitor and enforce the equitable services requirements under Titles I and VIII and, thus, should have a significant role in the State's monitoring process. Furthermore, the ombudsman should ensure that private school officials know how to contact the ombudsman. The following are examples of activities the ombudsman could undertake in fulfilling the roles and responsibilities of the position:

- Serve as a general resource regarding equitable services requirements for both LEAs and private school officials, which may include conducting initial outreach to define the contours of the ombudsman's responsibilities.
- Develop, in partnership with other relevant SEA staff, monitoring protocols applicable to the provision of equitable services and participate in a sample of any monitoring activity.
- Provide technical assistance regarding equitable services requirements for SEA staff administering applicable programs, LEA staff, and private school officials.

#### Contact Information

#### Shaun Owen

Director of Consolidated Federal Initiatives State Ombudsman 404-971-0096 sowen@doe.k12.ga.us

#### **Statewide Meetings**

Statewide Initial Consultation Meetings for Equitable Services FAQs

Participating Private Schools 2018-2019

Completed Statewide Meeting Registrations (As of 10-19-2018)

Sample Template Initial Consultation Invitational Letter to Private Schools (9-13-2018)

Statewide Initial Consultation Meeting Registration

#### Updates

Equitable Services Updates 10-9-18



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#### Equitable Services Updates

Contact- Shaun Owen (<u>sowen@doe.k12.ga.us</u> 404-971-0096) October 9, 2018

- Statewide Initial Consultation Meetings
  - Change- the Statewide Initial Consultation location for Houston County on 11-8-18 has changed from Perry to Warner Robins
  - See the <u>map</u> for more information.
  - To register for a meeting, please click on the <u>link</u>.
  - The meetings focus on Equitable Services for Title IA and VIII (IC, IIA, IIIA, IVA, IVB). Private schools
    interested in participating in Equitable Services can begin the planning process with LEAs for the 20192020 school year.
  - For LEAs working with private schools from multiple districts, the requested <u>registration information</u> for private schools and the locations their representatives will attend, minus the registrants' information, is updated each week and posted on the Equitable Services <u>website</u>.
  - Statewide Initial Consultation Meetings for Equitable Services FAQs

-Statewide Initial Consultation Meeting Information

## Education



## Updates

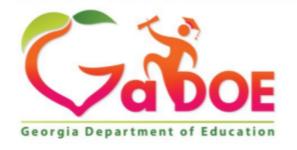
- Reminders for LEAs
  - Check the <u>nonprofit</u> status of all private schools participating in Equitable Services.
  - Check the physical address of the school. Title IA can go outside of the district. Title VIII stays within the district.
  - For districts with participating private schools for the 2017-2018 school year, we will not collect Form B via the Con App. That information will be collected via the online platform which will be explained at the Statewide Initial Consultation Meetings and in webinars.
  - The Data Cleanse for Private Schools runs from August 28, 2018 to June 28, 2019.
  - The Data Collection for Private Schools runs from November 6, 2018 to November 28, 2018.
  - Please work with your Superintendent's Office to ensure you are receiving up-to-date information
    regarding changes in private school location, student enrollment, new private schools and private
    schools that have closed.
- Reminders to Private Schools
  - Georgia law (O.C.G.A. § 20-2-690) provides, "Within 30 days after the beginning of each school year, it shall be the duty of the administrator of each private school to provide to the school superintendent of each local public school district which has residents enrolled in the private school a list of the name, age, and residence of each resident so enrolled. At the end of each school month, it shall be the duty of the administrator of each private school to notify the school superintendent of each local

-Reminders to private schools and LEAs



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public school district of the name, age, and residence of each student residing in the public school district who enrolls or terminates enrollment at the private school during the immediately preceding school month."

- The form mentioned above is referred to as the <u>DE1111</u>. If a private school has students that reside in 7 different districts, the form should be sent to all 7 districts.
- Allocations for Private Schools Participating in Equitable Services (2018-2019 school year)
  - <u>Title IA Allocations</u>
  - Title IC Allocations
  - <u>Title IIA Allocations</u>
  - <u>Title IIIA Allocations</u>
  - <u>Title IVA Allocations</u>
  - <u>Title IVB Allocations</u>

-DE1111 information -Allocations -21<sup>st</sup> CCLC grant

- FY20 21st Century Community Learning Centers Request for Proposal
  - Information can be found on the 21<sup>st</sup> Century Community Learning Centers <u>website</u>.
  - All proposal applications must be received by January 30, 2019 at 5:00 p.m. EST.



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# Forms for Equitable Services



#### **State Ombudsman**

Forms

Equitable Services Consultation Specifics 2018

Equitable Services (Title I and VIII) Complaint, Resolution and Appeal Process

Complaint Form

Form A - Initial Consultation for the 2019-2020 School Year

Form B - Participating Private Schools for the 2017-2018 School Year



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## Consultation Components- 1117

#### Private School-Equitable Services Consultation Specifics

#### CONSULTATION - Title IA (ESSA 1117)

(1) IN GENERAL.—To ensure timely and meaningful consultation, a local educational 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, the results of which agreement shall be transmitted to the ombudsman designated under subsection (a)(3)(B). Such process shall include consultation on issues such as—

(A) how the children's needs will be identified;

(B) what services will be offered;

(C) how, where, and by whom the services will be provided;

(D) how the services will be academically assessed and how the results of that assessment will be used to improve those services;

(E) the size and scope of the equitable services to be provided to the eligible private school children, the proportion of funds that is allocated under subsection (a)(4)(A) for such services, and how that proportion of funds is determined;

(F) the method or sources of data that are used under subsection (c) and section 1113(c)(1) to determine the number of children from low-income families in participating school attendance areas who attend private schools;
 (G) how and when the agency will make decisions about the delivery of services to such children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a

contract with potential third-party providers;

(H) how, if the agency disagrees with the views of the private school officials on the provision of services through a contract, the local educational agency will provide in writing to such private school officials an analysis of the reasons why the local educational agency has chosen not to use a contractor;

(I) whether the agency shall provide services directly or through a separate government agency, consortium, entity, or third-party contractor;

(J) whether to provide equitable services to eligible private school children-

(i) by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(A) based on all the children from low-income families in a participating school attendance area who attend private schools; or
 (ii) in the agency's participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(A) based on the number of children from low-income families who attend private schools;

(K) when, including the approximate time of day, services will be provided; and

(L) whether to consolidate and use funds provided under subsection (a)(4) in coordination with eligible funds available for services to private school children under applicable programs, as defined in section 8501(b)(1)to provide services to eligible private school children participating in programs.



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## Consultation Components- 8501

#### CONSULTATION — Title VIII (IC, IIA, IIIA, IVA, IVB) (ESSA 8501)

(1) IN GENERAL.—To ensure timely and meaningful consultation, a State educational agency, local educational agency, educational service agency, consortium of those agencies, or entity shall consult with appropriate private school officials. 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, on issues such as—

(A) how the children's needs will be identified;

(B) what services will be offered;

(C) how, where, and by whom the services will be provided;

(D) how the services will be assessed and how the results of the assessment will be used to improve those services;
(E) the size and scope of the equitable services to be provided to the eligible private school children, teachers, and other educational personnel, the amount of funds available for those services, and how that amount is determined;
(F) how and when the agency, consortium, or entity will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the private school officials on the provision of services through potential third-party providers; and

(G) whether the agency, consortium, or entity shall provide services directly or through a separate government agency, consortium, or entity, or through a third-party contractor; and

(H) whether to provide equitable services to eligible private school children-

(i) by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(C) based on all the children from low-income families in a participating school attendance area who attend private schools; or (ii) in the agency's participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(C) based on the number of children from low-income families who attend private schools.



**State Ombudsman** 

Forms

Equitable Services Consultation Specifics 2018

Equitable Services (Title I and VIII) Complaint, Resolution and Appeal Process

Complaint Form

Form A - Initial Consultation for the 2019-2020 School Year

Form B - Participating Private Schools for the 2017-2018 School Year



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## **Complaint, Resolution, and Appeal Process**



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#### Equitable Services (Title I and VIII) Complaint, Resolution and Appeal Process

#### Statutory Requirement

Pursuant to §§ 1117 and 8501 of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA), a private school official has the right to file a written complaint with the state education department ombudsman asserting that a school district did not engage in consultation that was meaningful and timely, did not give due consideration to the views of the private school, or did not make a decision that treats private school students equitably.

The Georgia Department of Education (GaDOE) has established the following Complaint, Resolution and Appeal Process for nonprofit private officials, school students, teachers and families ("complainant").

If the complainant believes that timely and meaningful consultation has not occurred, and the complainant has discussed their concerns with the LEA's point of contact responsible for coordinating the consultation and provision of services between the two entities, the complainant has the right to file a formal written complaint with GaDOE.

#### Complaint

To file a formal complaint with GaDOE, the complainant should complete and submit the <u>Complaint Form</u> to the State Ombudsman at <u>ombudsman@doe.k12.ga.us</u>.

- Complainants should ensure that the complaint and all supporting documentation are complete before submitting a complaint. No additions or corrections may be made to the written complaint once the complaint has been submitted unless requested or agreed to by GaDOE.
- Upon receipt of a complaint, the written complaint will be promptly acknowledged and investigated. GaDOE will send a copy of the complaint to all parties involved, including the LEA. Those entities will be allowed to respond to the complaint in writing within fifteen (15) calendar days of receipt.
- 3. Appropriate program staff, including the State Ombudsman, will conduct a review of the complaint. If necessary, an on-site review may be conducted. If appropriate, additional information may be gathered and forwarded to other appropriate offices or organizations. If additional information is needed, the complainant and the LEA will be contacted.

#### Resolutions

Listed below are possible resolutions to the complaint:

- 1. The GaDOE may require the LEA to take actions necessary to bring the LEA in compliance with ESSA's equitable services requirements.
- The GaDOE may identify issues that hinder the delivery of services. The State Ombudsman will meet with the parties to resolve the issues and develop a plan to ensure timely and meaningful delivery of services. All parties will be informed of required actions and timelines.
- The GaDOE may determine the LEA is compliant with the equitable services provisions of ESSA.
- The State Ombudsman, along with a review team comprised of Title I and VIII State Educational Agency (SEA) program managers/specialists, may determine direct delivery of services should be provided.
  - a) If determined, GaDOE will provide equitable services for the fiscal year to the eligible complainant through third-party contracts with public or private agencies, organizations, or institutions [ESSA Section 1117(b)(6)(C)].
  - b) Once direct services have been provided for the fiscal year, GaDOE shall invoice the LEA involved for the services provided, including any administrative fees.
  - c) GaDOE will provide technical assistance to the LEA involved to ensure that the LEA meets the requirements of the ESSA Sections 1117 and 8501 in subsequent years.

#### Appeal

If the complainant does not feel that the issue has been resolved through the GaDOE complaint process or GaDOE fails to resolve the complaint within the forty-five (45) day time limit, the complainant can appeal to the U.S. Secretary of Education.

- a. The complainant can appeal the decision by filing an appeal with the U.S. Secretary of Education within thirty (30) calendar days after the resolution of the complaint. If the forty-five (45) day time limit for response by the State Ombudsman has passed without a decision, the deadline for filing an appeal is thirty (30) calendar days after the forty-five (45) day deadline.
- b. The appeal to the U.S. Secretary of Education must be accompanied by a copy of the resolution by the State Ombudsman and a complete statement of the reasons for an appeal.
- c. The U.S. Secretary of Education shall investigate and resolve the appeal no later than ninety (90) calendar days after receipt of the appeal.



#### **State Ombudsman**

Forms

Equitable Services Consultation Specifics 2018

Equitable Services (Title I and VIII) Complaint, Resolution and Appeal Process

#### Complaint Form

Form A - Initial Consultation for the 2019-2020 School Year

Form B - Participating Private Schools for the 2017-2018 School Year



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<b>Complaint For</b>	Richard Wood
Complaint Form for Equitable Services for Title I and Programs Covered under Title VIII to Private School Students and Teachers Office of the State Ombudsman	Please describe the issue(s), including dates; and any steps you have taken and people you have contacted from the LEA to resolve the issue and their response(s). Please attach any supporting documentation.
Name of person filing complaint         Title/position of person filing complaint         Name of private school         Street address of private school         Email         Phone number         Name of Local Educational Agency (LEA) complaint is against         Street address of LEA         Contact name         Email         Phone number         Title I and VIII programs (ESEA section 1117 and 8301):         • Title I, Part A - Improving basic programs operated by LEAs         • Title I, Part A - Subporting effective instruction state grants         • Title I, Part A - Subporting effective instruction state grants         • Title II, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effective instruction state grants         • Title IV, Part A - Subporting effectine michanent grants	Please describe the solution or the action you feel would resolve this problem.         Please describe the solution or the action you feel would resolve this problem.         Marcine to enter a date.         Sty typing your name, this serves as your electronic signature.       Date
Georgia Department of Education + Office of the State Ombudemen 1866 Twin Towers East + 205 Jense Hill Jr. Drive + Atlenta, Georgia 30334 + <u>www.padow.org.</u> September 2017 + Page 1 of 3	Georgia Department of Education • Office of the State Ombudsman 1866 Twin Towers East • 205 Jease Hill Jr. Drive • Atlanta, Georgia 30334 • <u>www.padoe.org</u> September 2017 • Page 2 of 3

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## **Complaint Form**



This form must be signed and submitted to the Georgia Department of Education and a copy to the local school system. In lieu of mailing, you can email to Shaun Owen @ sowen@doe.k12.ga.us.

> Georgia Department of Education Office of the State Ombudsman 1866 Twin Towers East 205 Jesse Hill Jr. Drive Atlanta, GA 30334

Change to Existing Requirement: Complaint Process for Participation of Private School Children – Time Limit The timeframe that an SEA has for responding to a complaint from parents, teachers, or other individuals concerning violations of ESEA section 8501 regarding the participation by private school children and teachers is 45 days. In addition, the Secretary must investigate and resolve an appeal of an SEA's resolution of a complaint within 90 days. (ESEA section 8503.)

#### Changes to Existing Requirement: Consultation

The topics subject to consultation have been expanded to include the following:

- · How the proportion of funds allocated for equitable services is determined.
- 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 private school children by pooling funds or on a school-byschool basis.
- When, including the approximate time of day, services will be provided.
- Whether to consolidate and use funds available for Title I equitable services in coordination with eligible
  funds available for equitable services under programs covered under section 8501(b) to provide services to
  eligible private school children in participating programs.

The written affirmation that consultation has occurred must provide the option for private school officials to
indicate such officials' belief that timely and meaningful consultation has not occurred or that the program
design is not equitable with respect to eligible private school children.
(ESEA section 1117(b)(1).)

Relevant Statutory, Regulatory, and Guidance References

- Title IX TITLE IX. PART E UNIFORM PROVISIONS SUBPART 1—PRIVATE SCHOOLS Equitable Services for Eligible Private School Students, Teachers, and Other Educational Personnel Non-Regulatory Guidance, Section H and sample form J-16
- . 34 C.F.R. 5299.12
- ESSA Sections 1117(b)(6); 1117(c)2; and 8501(c)6

For internal use only-

Date of receipt of form: Click here to enter a date.

Completion of complaint process: Click here to enter a date.

Georgia Department of Education + Office of the State Ombudisman 1866 Twin Towers East + 205 Jasse Hill Jr. Drive + Atlanta, Georgia 30134 + <u>www.gadow.org</u> September 2017 + Page 3 of 3 -45 days for SEA to respond to complaint
-30 days for private school to appeal

-90 days for USDE to respond to appeal

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**State Ombudsman** 

Forms

Equitable Services Consultation Specifics 2018

Equitable Services (Title I and VIII) Complaint, Resolution and Appeal Process

Complaint Form

Form A - Initial Consultation for the 2019-2020 School Year

Form B - Participating Private Schools for the 2017-2018 School Year



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f Education

# Form A- All LEAs-Online- Due 6/30/19

into the ConApp as has been the process the past two years.



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				_				
			CONTRACTOR OF CO					
Ē	Private	School II	Form A for the 2019-2020 School Year nitial Consultation and Notification of Intent for 2019-2020 Provision of Services Affirmation of Initial Consultation and Intent Notification	Part 2	Noti	fication		Form A for the 2019-2020 School Year
Local Edu		gency (I	LEA)					
Private Sc								ates that the LEA has no private schools participating in equitable services in 2019-2020.
Private Sc Private Sc			Email:	Offi		Yes	No	Intent Notification (ESSA Section 1117 and 8501)
Private Sc				Private	heol			The Private School intends to continue consultation and participate in 2019-2020 equitable services. It is the responsibility of the LEA to design, develop, and implement
LEA Feder	-			Public 5	haal			the service provided to the private school students, after on-going consultation with the private school.
above inter	nds to c Both S Schoo Conso	onsult v Title I A School O l Official	g services to Private Schools (Place an "X" in each program where the Private School listed vith the LEA on possible services): <b>Title II A Title II A Title II C Title IV A Title IV B</b> fficials (private and public) must initial under either YES or NO for each statement. Both s must also sign and date this document, which must then be scanned and attached to the Application in the Portal no later than June 30, 2018 (even if no private school participation elow).			and Title Signatu	of Private S	School Official
Part 1: Tim	ely and	l Meanir	ngful Consultation Affirmation – Initial Consultation	Con	ment	5:		
Official Private School	Yes	No	Consultation Requirements (ESSA Sections 1117 and 8501)					
Private school Public School			<ul> <li>The initial consultation for the 2019-2020 school year has occurred between the LEA and Private School. Date</li></ul>					I
participat	tion rela	ated to E	Whether to consolidate and use funds available for Title I equitable services in coordination with eligible funds available for equitable services under programs covered under section 8501(b) to provide services to eligible private school children in participating programs.  School Year, GaDOE will be switching to an online platform for entering information and equitable Services. This form will be used for private schools to notify LEAs of their				t	For Participation in he 2019-2020 School ear
			Equitable Services. Final participation and allocation numbers will be entered into the date being moved from December 15, 2018 to June 30 <sup>th</sup> , 2019. Do not submit this form					

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#### **State Ombudsman**

Forms

Equitable Services Consultation Specifics 2018

Equitable Services (Title I and VIII) Complaint, Resolution and Appeal Process

Complaint Form

Form A - Initial Consultation for the 2019-2020 School Year

Form B - Participating Private Schools for the 2017-2018 School Year



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# Form B- Participating Private Schools-Online-Due 12/15/18



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Form B for the School Y	
3011001	Richard Woods, Geregia's Bohool Bagerintandeet Tatooting Deregia's Pohon"
	Private School Participation in the 2017-2018 School Year
Affirn	nation of Timely/Meaningful Ongoing Consultation and Equitable Services
Local Education Agency	(LEA)
Private School	
Private School Address	
Private School Phone	
Private School Official	
LEA Federal Program Of	ficial Phone:
(Title IIIA- English language ac (Title IVA- Student support an <b>Directions:</b> Both School School Officials will initia services implementation dates listed for Part 1 an	rrams operated by LEA3) (Title IIA- Supporting effective instruction) quisition, language enhancement, and academic achievement) (Title IC- Education of migratory children) d academic enrichment) (Title IVB-21 <sup>er</sup> Century Community Learning Centers) Officials (private and public) must initial under either YES or NO for each statement. Both al, sign, and date this document following the ongoing consultation AND the equitable h. This document must be scanned and attached to the Consolidated Application by the due id Part 2 below. ningful Consultation Affirmation – Ongoing Consultation – Due date: December 15, 2018
Official Yes No	Consultation Requirements (ESSA Sections 1117 and 8501)
	Timely and meaningful consultation occurred regarding the needs and services of eligible children
Public School	and their teachers and families. Consultation Dates
Private School	The local education agency gave due consideration to the views of the private school official.
Public School	The program design/provision of services agreed upon by the local education agency and private
Private School	

Part 2: Equitable Provision of Services (If equitable services were then provided in FY18, the due date for Part 2 is by December 15, 2018, after the 2017-2018 grant period.)

Official	Yes	No	Consultation Requirements (ESSA Sections 1117 and 8501)								
Private School			Comises home a	t the time requester	and agreed upon by the private school official. Date						
Public School			Services began a	t the time requested	and agreed upon by the private school official. Date						
Private School			The legal educat	on property graph due consideration to the views of the private school official							
Public School			The local educat	he local education agency gave due consideration to the views of the private school official.							
Private School											
Public School			Satisfactory serv	Satisfactory services were provided during the school year.							
	Sig	nature <u>P</u>	rivate School Official	Part 1:	Part 2:						
Printed Na	me and 1	Title of <u>P</u>	rivate School Official	Part 1:	Part 2:						
			Date	Part 1 Date:	Part 2 Date:						
	Si	gnature	Public School Official	Part 1:	Part 2:						
Printed Na	ame and	Title of	Public School Official	Part 1:	Part 2:						
			Date	Part 1 Date:	Part 2 Date:						

-For Private Schools that Participated in Equitable Services in 2017-2018

#### t of Education

Form B	s for	r the	2017-20						
	School Year								
	Private School Participation in the 2017-2018 School Year								
	Affirmation of Timely/Meaningful Ongoing Consultation and Equitable Services								
Local Educ	ation A	Agency	/ (LEA)						
Private Sch	nool	-							
Private Sch	nool Ad	ddress							
Private Sch									
Private Sch	nool Of	fficial							
LEA Federa	al Prog	ram O	fficial	Phone:					
to consult of (Title IA- Impi (Title IIIA- Eng (Title IIVA- Eng (Title IVA- Stu <b>Directions:</b> School Offi services im dates listed	Federal Program(s) offering services to Private School (Place an "X" in each program where the Private School intends to consult with the LEA on possible services):         Title I A       Title II A       Title III A       Title I C       Title IV A       Title IV B         (Title IA- Improving basic programs operated by LEAs) (Title IIA- Supporting effective instruction)       Title II C       Title II C       Title IV B         (Title IIA- English language acquisition, language enhancement, and academic achievement) (Title IC- Education of migratory children)       (Title IVA- Student support and academic enrichment) (Title IVB- 21" Century Community Learning Centers)         Directions:       Both School Officials (private and public) must initial under either YES or NO for each statement. Both School Officials will initial, sign, and date this document following the ongoing consultation AND the equitable services implementation. This document must be scanned and attached to the Consolidated Application by the due dates listed for Part 1 and Part 2 below.								
Official	Yes	No		tation Affirmation – Ongoing Consultation – Due date: December 15, 2018 Consultation Requirements (ESSA Sections 1117 and 8501)					
Private School	162	NU	Timely and mea	ningful consultation occurred regarding the needs and services of eligible children					
Public School				rs and families. Consultation Dates					
Private School Public School			The local educat	ion agency gave due consideration to the views of the private school official.					
Private School Public School			The program de school is equitat	sign/provision of services agreed upon by the local education agency and private ole.					
				(If equitable services were then provided in FY18, the due date for Part 2 is 2018 grant period.)					
Official	Yes	No		Consultation Requirements (ESSA Sections 1117 and 8501)					
Private School Public School			Services began a	t the time requested and agreed upon by the private school official. Date					
Private School Public School			The local educat	ion agency gave due consideration to the views of the private school official.					
Private School Public School			Satisfactory serv	ices were provided during the school year.					
	Sig	nature <u>P</u>	rivate School Official	Part 1: Part 2:					
Printed Na	-	_	rivate School Official	Part 1: Part 2:					
	-		Date	Part 1 Date: Part 2 Date:					
Printed of			Public School Official	Part 1: Part 2: Part 1: Part 2:					
Printed Na	ame and	i i ttie of	Public School Official Date	Part 1: Part 2: Part 1 Date: Part 1 Date: Part 1 Date: Part 2 Date:					
			Date						



that Participated in Equitable Services in 2017-2018

-For Private Schools

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#### **State Ombudsman**

Forms

Equitable Services Consultation Specifics 2018

Equitable Services (Title I and VIII) Complaint, Resolution and Appeal Process

Complaint Form

Form A - Initial Consultation for the 2019-2020 School Year

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# **Nonprofit Status**



#### **State Ombudsman**

#### Resources

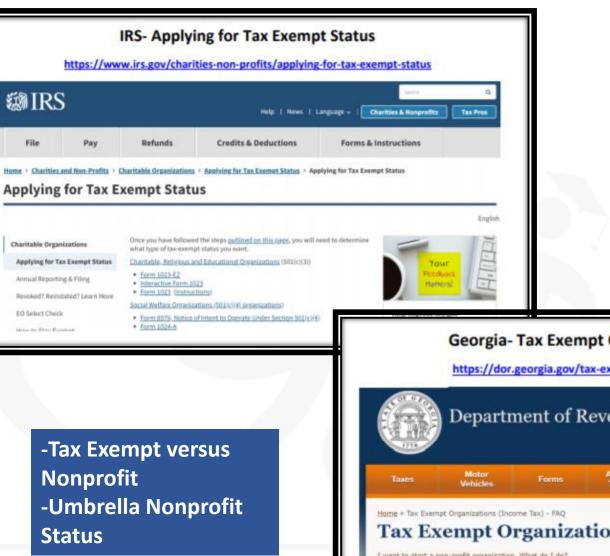
- Nonprofit Status and Equitable Services
- Overarching Requirements for All Federal Programs - Pages 40-42 and 52-69
- The Use of the W9 and 1099
- Transferability
- Private School Data Collections Includes the Following Resources:
  - DE1111 Form Updated 9/18/17
  - Private School Directions
  - Private School Data Collection Webinar -9/15/17
- Private Schools
- Title IVA
- FY18 Title IIA Planning for Funding Essential Questions



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#### **Georgia- Tax Exempt Organization Information**

https://dor.georgia.gov/tax-exempt-organizations-income-tax-faq

Coreto					Translate   Home   About   Contrad				
	Departn	nent of R	levenue		arth this sile	Q			
Taxes	Motor Vehicles	Forms	Alcohol & Tobacco	Rules & Policies	Local Government	Help			

#### Tax Exempt Organizations (Income Tax) - FAQ

I want to start a non-profit organization. What do I do?

I have received a determination letter from the IRS. What do I do for Georgia?

Will form 3605 get me an exemption from sales tax also?

We are a tax exempt organization. What do we file with the Georgia Department of Revenue?

We are filing form 990. 990EZ or 990PF with the IRS. What do we file with Georgia?

We are filing form 990-T with the IRS (unrelated business income tax return). What do we file with Georgia?

Our pension plan/employee benefit plan is filing form 5500 with the IRS. What do we file with Georgia?

What is the mailing address for form 3605 and the Georgia copies of forms 990 and 5500?

We are a Homeowners Association. What do we file with Georgia?



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	https://apps.irs.gov/app/eos/					
@ IRS			Help   News	Seach	Q. Tax Pros	
File	Pay	Refunds Credit	ts & Deductions	Forms & Instructions		
Home > Charities and	Non-Profits > 5	iearch for Charities > Tax Exempt 0	organization Search			
Tax Exemp	t Organ	ization Search				
Select Database 🛙	,	Search By	Search Term	0		
		Employer Identification Number	r 👻 Enter EIN Num	ber		
Search All	*					
Search All	~	State	Country			
	×	State All States	Country United States	×		
City	×			×		



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# Federal Programs Handbook



#### **State Ombudsman**

#### Resources

- Nonprofit Status and Equitable Services
- Overarching Requirements for All Federal Programs - Pages 40-42 and 52-69
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- FY18 Title IIA Planning for Funding Essential Questions



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#### Updated Handbook





#### FEDERAL PROGRAMS HANDBOOK

nformation Applicable to All Federal Programs



#### Pages 52-69

#### Chapter 5: Equitable Services for Private Schools

Under the Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act (ESSA), there are a number of programs that require the equitable participation of private school students, teachers, principals and other school leaders. The ESSA requires LEAs to provide services to private school students, teachers, principals and other school leaders that are equitable to those provided to students, teachers, principals and other school leaders in the LEA.

Participating programs include:

- · Title I, Part A Improving the Academic Achievement of the Disadvantaged
- · Title I, Part C Education of Migratory Children
- Title II, Part A Supporting Effective Instruction
- Title III, Part A English Language Acquisition and Language Enhancement
- · Title IV, Part A Student Support and Academic Enrichment Grant
- Title IV, Part B 21st Century Community Learning Centers

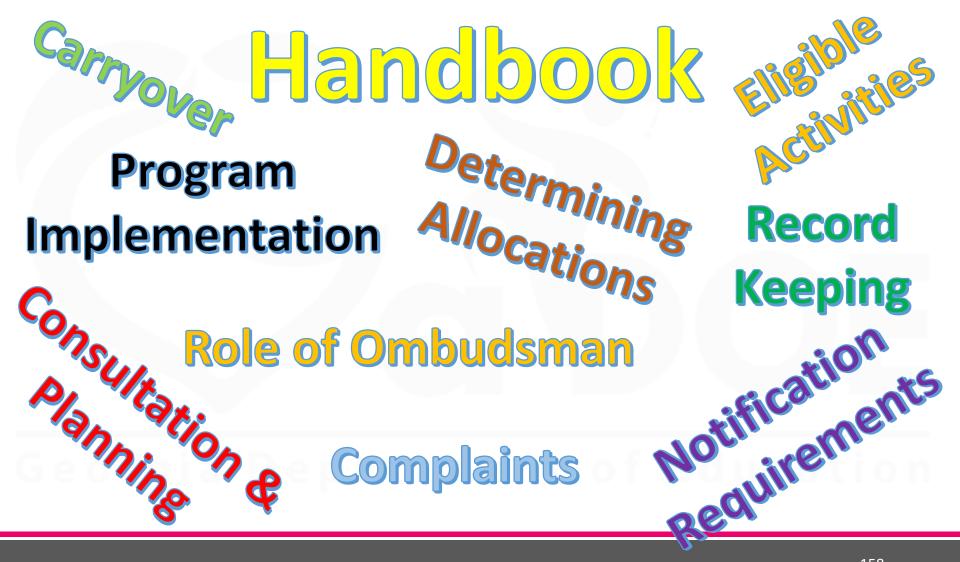
The following guidance provides information to LEAs about private school participation and the resources that are available in determining appropriate use federal funds.

This chapter includes the following sections:

Private Schools: Provision of Equitable Services Private Schools: Notification Requirements Private Schools: Consultation and Planning Private Schools: Determining Allocations Private Schools: Carryover Private Schools: Eligible Activities Private Schools: Program Implementation Private Schools: Record Keeping Private Schools: Complaints Private Schools: Role of the Ombudsman Private Schools: Applicable Federal Guidance Private Schools: Equitable Services for Private Schools for the IDEA



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# W-9 and 1099

# Website



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#### Resources

- Nonprofit Status and Equitable Services
- Overarching Requirements for All Federal Programs - Pages 40-42 and 52-69
- The Use of the W9 and 1099
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- Private School Data Collection Webinar -
  - 9/15/17
- Private Schools
- Title IVA
- FY18 Title IIA Planning for Funding Essential

Questions



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# **Transferability**





#### Resources

- Nonprofit Status and Equitable Services
- Overarching Requirements for All Federal Programs - Pages 40-42 and 52-69
- · The Use of the W9 and 1099
- Transferability
- Private School Data Collections Includes the

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  - 9/15/17
- Private Schools
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- FY18 Title IIA Planning for Funding Essential

Questions



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# **Private School Data** Collections (DE1111)



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#### Resources

- Nonprofit Status and Equitable Services
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    - 9/15/17
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# **FY2018 Private School Data Collection**

Each district superintendent is required to report the total number of students who are living within their county but attending a private school.

FY2018 Private School Data Collection Resources

- Private School DE Form 1111 (Updated 9/18/2017)
- Private School Instructions
- Private School Data Collectoin webinar (9/15/2017)

Prior year Private School resources



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 What is the difference between the Data Collection and the Data Cleanse?
 When do each begin/end?



# **FY2018 Private School Data Collection**

Each district superintendent is required to report the total number of students who are living within their county but attending a private school.

#### FY2018 Private School Data Collection Resources

- Private School DE Form 1111 (Updated 9/18/2017)
- Private School Instructions
- Private School Data Collectoin webinar (9/15/2017)

Prior year Private School resources

Data Collections 11/6/18-11/28/18

Data Cleanse 8/28/18-6/28/29





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- What future trainings would benefit you in your role related to Equitable Services?
- Would you prefer webinar, face-to-face or both?

# Website

#### **State Ombudsman**

#### **Allocations and Proportionate Share**

- FY19, Title I, Part A Proportionate Share for Equitable Services
- FY19, Title I, Part A Method for Determining Proportionate Share
- FY19, Title I, Part C Private School Proportionate Share
- FY19, Title I, Part C Method for Determining Proportionate Share
- FY19, Title IIA, Private School Proportionate Share and Methodology
- FY19, Title III, Part A Method for Determining Proportionate Share
- FY19, Title III, Part A Private School Proportionate Share
- FY19, Title IV, Part A Private School Proportionate Share
- FY19, Title IV, Part A Method for Determining Proportionate Share
- FY19, Title IV, Part B Method for Determining Proportionate Share



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- ITTIE IVA
- FY18 Title IIA Planning for Funding Essential Questions

#### Trainings

Equitable Services Overview and Updates (April 2018)

- Spring 2018 Webinar
- Spring 2018 PPT

Equitable Services to Private School Children -Training for Private School Staff

- · Video in MP4 format
- · PPT File in PDF format

Private Schools and ESSA- Focus on Title I

- Video in MP4 format
- PPT File in PDF format

Private Schools and ESSA- Focus on Title II, Part A

- · Video in MP4 format
- PPT File in PDF format

**Allocations & Proportionate Share Archive** 

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# Allocations Methodology

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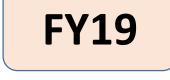
# **Allocations and Proportionate Share**

- FY19, Title I, Part A Proportionate Share for Equitable Services
- FY19, Title I, Part A Method for Determining Proportionate Share
- FY19, Title I, Part C Private School Proportionate Share
- FY19, Title I, Part C Method for Determining Proportionate Share
- FY19, Title IIA, Private School Proportionate Share and Methodology
- FY19, Title III, Part A Method for Determining Proportionate Share
- FY19, Title III, Part A Private School Proportionate Share
- FY19, Title IV, Part A Private School Proportionate Share
- FY19, Title IV, Part A Method for Determining Proportionate Share
- FY19, Title IV, Part B Method for Determining Proportionate Share





**State Ombudsman** 



# Website

#### **State Ombudsman**

#### **Allocations and Proportionate Share**

- FY19, Title I, Part A Proportionate Share for Equitable Services
- FY19, Title I, Part A Method for Determining Proportionate Share
- FY19, Title I, Part C Private School Proportionate Share
- FY19, Title I, Part C Method for Determining Proportionate Share
- FY19, Title IIA, Private School Proportionate Share and Methodology
- FY19, Title III, Part A Method for Determining Proportionate Share
- FY19, Title III, Part A Private School Proportionate Share
- FY19, Title IV, Part A Private School Proportionate Share
- FY19, Title IV, Part A Method for Determining Proportionate Share
- FY19, Title IV, Part B Method for Determining Proportionate Share

# FY18



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- ITTLE IVA
- FY18 Title IIA Planning for Funding Essential Questions

#### Trainings

Equitable Services Overview and Updates (April 2018)

- Spring 2018 Webinar
- Spring 2018 PPT

Equitable Services to Private School Children -Training for Private School Staff

- · Video in MP4 format
- PPT File in PDF format

Private Schools and ESSA- Focus on Title I

- Video in MP4 format
- · PPT File in PDF format

Private Schools and ESSA- Focus on Title II, Part A

- · Video in MP4 format
- PPT File in PDF format

**Allocations & Proportionate Share Archive** 

# Website



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#### **State Ombudsman**

Allocations & Proportionate Share

FY18, Title I, Part A Private School Proportionate Share

FY18, Title I, Part A Method for Determining Proportionate Share

FY18, Title I, Part C Method for Determining Proportionate Share

FY18, Title I, Part C Private School Proportionate Share

FY18, Title II, Part A LEA Allocations

FY18, Title II, Part A Private School Proportionate Share

FY18, Title II, Part A Method for Determining Proportionate Share

#### \_ \_ \_

FY18, Title III, Part A Private School Proportionate Share

FY18, Title III, Part A Method for Determining Proportionate Share

FY18, Title IV, Part A LEA Allocations

FY18, Title IV, Part A Private School Proportionate Share

FY18, Title IV, Part A Method for Determining Proportionate Share

FY18, Title IV, Part B Method for Determining Proportionate Share FY18



#### lucation



#### FY18 Title I, Part A Private School Proportionate Share

(For LEAs with Participating Private Schools)

LEA	Title I FY18 Allocation	Total # of Participating Private Schools in FY18	Private Schools Total # Students of Poverty	LEA's Total # Students of Poverty	Total Poverty Count of Private School and LEA	Proportionate Percentage	Pro	portionate Share Amount
Atlanta Public School	\$ 27,925,760	8	121	32,150	35,271	0.34%	\$	94,948
Bibb County	\$ 12,585,083	4	184	19133	19317	0.95%	\$	119,558
Camden County	\$ 1,711,165	1	14	4209	4223	0.33%	\$	5,647
Chatham County	\$ 12,744,389	8	218	16334	16552	1.32%	\$	168,226
Clarke County	\$ 7,049,648	2	68	6087	6155	1.10%	\$	77,546
Clayton County	\$ 22,092,303	10	188	49466	49654	0.38%	\$	83,951
Cobb County	\$ 21,554,808	3	35	31369	31404	0.11%	\$	23,710
DeKalb County	\$ 39,380,660	16	553	65111	65664	0.84%	\$	330,798
Dougherty County	\$ 8,442,279	1	29	9392	9421	0.31%	\$	26,171
Fayette County	\$ 1,428,912	1	7	2157	2164	0.32%	\$	4,573
Floyd County	\$ 2,367,590	1	10	2664	2674	0.37%	\$	8,760
Fulton County	\$ 21,502,816	6	98	31841	31939	0.31%	\$	66,659
Glynn County	\$ 4,079,477	1	18	5868	5886	0.31%	\$	12,646
Gwinnett County	\$ 37,885,492	7	126	65431	65557	0.19%	\$	71,982
Henry County	\$ 7,194,381	2	5	11054	11059	0.05%	\$	3,597
Jones County	\$ 870,975	1	1	2572	2573	0.04%	\$	348
Lee County	\$ 763,796	1	2	2664	2666	0.08%	\$	611
Marietta City	\$ 2,318,039	1	31	5342	5373	0.58%	\$	13,445
Monroe County	\$ 685,624	1	1	1498	1499	0.07%	\$	480
Muscogee County	\$ 11,424,262	3	69	16414	16483	0.42%	\$	47,982
Oconee County - Private School Declined	\$ 430,264	0	0	522	523	0.19%	\$	818
Richmond County	\$ 14,916,021	1	29	9000	9029	0.32%	\$	47,731
Rome City	\$ 2,496,936	2	29	3773	3802	0.76%	\$	18,977
Terrell County	\$ 1,081,052	1	2	1099	1101	0.18%	\$	1,946
TOTALS	\$ 262,931,732	82	1838	395150	399989	0.46%	\$	1,231,110



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# **Title IA Methodology**

Title I, Part A: Determination of Proportionate Share of Title I, Part A Funds for Private Schools

Under the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Succeeds Act (ESSA) Section 1117(4)(A)(ii), the proportional share of Title I funds for private schools shall be determined based on the total amount of Title I, Part A funds received by the local education agency (LEA) prior to any allowable expenditures or transfers by the LEA.

The steps to determine the Proportionate Share formula is calculated as follows:

1. The LEA determines the participating public attendance school areas of Title I schools only.

 The LEA determines the number of children from low-income families residing in each participating area (Title I schools) who attend public and private schools.

 The LEA determines proportion of children from low-income families residing in each participating area (Title I schools) who attends private schools.

The LEA applies the private school proportion to the LEA's total Title I allocation to determine the equitable services proportionate shared.

An example of the above calculation:

Step 1: An LEA named All Georgia School System has a total of ten schools, but only six are Title I schools, which are comprised of three elementary, two middle, and one high school. These six Title I schools are the participating public attendance school areas in Title I funds.

Step 2: The total student enrollment for these six Title I schools is 4,278 and their total number of students from low-income families is 3,251. The All Georgia School System has four private schools participating in the LEA's Title I funds. These four private schools have a total of 36 students who reside within the six Title I schools' attendance zones. Of these 36 students attending private schools, only 12 of the students are from low-income families. Therefore, the total count of students from low-income families is 3,263 (3,251 from the LEA's Title I schools, plus 12 from the private schools who reside in Title I schools' attendance zones).

Step 3: The private school proportionate share is determined by dividing the total private school students from low-income families (12) by the total students from low-income families at the private schools and the LEA (3,263). Therefore, 12/3,263 equals .0037 rounded to four decimal places.

Step 4: If the All Georgia School System received a Title I, Part A allocation totaling \$4,080,250, the four private schools' proportionate share would be \$15,097 (\$4,080,250 x .0037). The LEA would have \$15,097 to provide equitable services of eligible private school students who reside in the LEA's attendance areas.

Public School Title I Attendance Areas for the All Georgia School System (LEA)	Number of Public School children from Low-Income Families at Title I schools	Number of Private School children from Low- Income Families residing in the All Georgia School System's Title I Attendance Zones	Total Number of children from Low-Income Families
High School	750	3	753
Middle School	600	2	602
Middle School	500	2	502
Elementary School	500	2	502
Elementary School	450	2	452
Elementary School	451	1	452
TOTAL	3251	12	3263
PROPORTIONATE SHARE of	.9963	.0037	
the All Georgia School System's Title I allocation of \$4,080,250	\$4,065,153 (LEA's share)	\$15,097 (Private Schools' Share)	

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# Scenarios & Best Practices

- Discuss real life scenarios related to Equitable Serivces.
- Discuss best practices related to Equitable Services.

# Scenario: W-9 and 1099



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GaDOE received an inquiry asking for clarification as to whether or not W-9 can be required of private school teachers. There was concern both about protecting personally identifiable information (PII), and about how this might influence private school audits.

#### Key Take-aways

- What is the purpose of both forms?
- How do LEAs protect personally identifiable information?
- What does the GaDOE guidance say?
- What should LEAs take away as next steps?

# Scenario: How do you solve this reimbursement issue?



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GaDOE received an inquiry about reimbursement. A private school requested to send two staff members to a conference. The staff members did not have personal wealth; the private school does have a church funded account from which they take care of such operations. In order to attend the conference they withdrew money, purchased a pre-paid debit card and paid for flights. The private school is now requesting reimbursement. Can the LEA reimburse the church account?

# Scenario: How do you solve this reimbursement issue? (continued)



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#### Key Take-aways:

- What does current OMB Regulations and USDE Non-Regulatory Guidance say about controls of funds?
- How would your current internal controls address this scenario?
- What do GaDOE and USDE Recommend?
- What should LEAs take away as next steps?

# Scenario: It's all about the reimbursement.....



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#### GaDOE received several more inquiries about reimbursement:

 A private school teacher does not have the personal funds to pay for a trip out of pocket. Another teacher not attending the conference paid for the teacher.

Who gets reimbursed?

 A private school teacher does not have the personal funds to pay for a trip out of pocket. The principal pays for the conference with a school card with the principal's name on it. Who gets reimbursed?

# Scenario: It's all about the reimbursement.....



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# GaDOE received several more inquiries about reimbursement:

 A groups of private school teachers attend a conference with their principal. The principal pays for the conference lodging, meals, rental car and mileage out of pocket.

# Who gets reimbursed? What documentation is needed?

An approved private school teacher is scheduled to attend a conference. The participant's registration is prepaid by the LEA. The teacher gets sick and the school sends another private school employee, not allowable under grant funds.
 Can the LEA ask for reimbursement?

# Scenario: Keep calm and mediate



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GaDOE received an inquiry about allowability. Title II, Part A allowability has changed under ESSA, but some private schools want to continue their same spending habits. How can LEA coordinators help ensure that, through consultation, the law, regulations, and guidance are followed?

# **Key Take-aways**

- What resources can LEAs pull from?
- What successful practices have some LEAs put in place?





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# **Online Platform**

- What is the purpose of the online platform?
- What was the previous process for submitting forms related to Equitable Services?
- What is the functionality of the online platform?



# **Previous Process**

- What is the purpose of the online platform?
- What was the previous process for submitting forms related to Equitable Services?
- What is the functionality of the online platform?

# Purpose



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- Greater efficiency- incomplete forms will not be able to be submitted, thus will not be returned
- Reduced travel for form sign-offs and submissions
- Greater speed for submitting, processing and reviewing forms
- Greater functionality- Invitation Letters and correspondence with private schools
- More up-to-date database- pulls directly from the DE1111 submissions
- Reminders, missing submissions and bounce-back notifications to LEAs



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# **Previous Process**





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# **ES4PS Demo**

# **Equitable Services for Private Schools**



#### gadoe.org

# Equitable Services 4 Private Schools (ES4PS)

Home	School List	Invitation Manager	Form A Manager	Form B Manager	Admin 🔻	
School Ye	ear: 2018 - 20	D19 • District:	Jackson County		You are logged in as:	District User

Invitation Summary	
Total Invitation Sent:	4
Invitation Not Opened:	0
Invitation Accepted:	0
Percentage Invitation Accepted:	0%

Form A Summary	
Total Form A Sent:	2
Form A Completed:	0
Form A Signed Off:	2
Percentage Signed Off:	100%

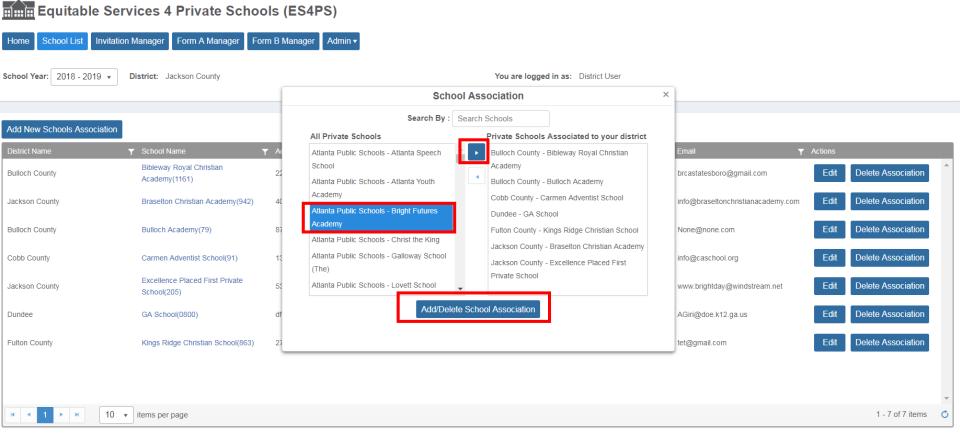
Form B Summary	
Total Form B Sent:	0
Form B Completed:	0
Form B Signed Off:	0
Percentage Signed Off:	0%



Equitable Ser	vices 4 Private Schoo	ols (ES4PS)						
Home School List Invitation Manager Form A Manager Form B Manager Admin								
School Year: 2018 - 2019 🔻	District: Jackson County			You are logged in as: District User				
Add New Schools Association								
District Name	Y School Name	▼ Address	▼ School Contact	▼ Phone Number	▼ Email ▼	Actions		
Bulloch County	Bibleway Royal Christian Academy(1161)	220 Cone Street, Statesboro	Johnson, Cierra	(912) 678-7273	brcastatesboro@gmail.com	Edit	Delete Association	•
Jackson County	Braselton Christian Academy(942)	401 Zion Church Rd., Braselton	Hooper,Laura	(706) 824-9943	info@braseltonchristianacademy.com	Edit	Delete Association	
Bulloch County	Bulloch Academy(79)	873 Westside Rd., Statesboro	Collins, Becky	(912) 764-0715	None@none.com	Edit	Delete Association	
Cobb County	Carmen Adventist School(91)	1330 Cobb Pkwy N,Marietta	Cummings, Calvin	(770) 424-0606	info@caschool.org	Edit	Delete Association	
Jackson County	Excellence Placed First Private School(205)	531 Ridgewood Dr., Pendergrass	Smith,Stephanie	(678) 579-2929	www.brightday@windstream.net	Edit	Delete Association	
Dundee	GA School(0800)	dfdfdfd,fgfgfgfg	fgfgf,tests	(232) 323-2323	AGiri@doe.k12.ga.us	Edit	Delete Association	
Fulton County	Kings Ridge Christian School(863)	2765 Bethany Bend, Alpharetta	Vaughn, Susan	(770) 754-5738	tet@gmail.com	Edit	Delete Association	
								-
H < 1 F H 10 -	items per page						1 - 7 of 7 items	Q



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School Year: 2018 - 2019 -

#### Add New Schools Association

District Name	▼ School Name	▼ Address	School Contact	Y Phone Number	▼ Email	▼ Actions
Bulloch County	Bibleway Royal Christian Academy(1161)	220 Cone Street, Statesboro	Johnson, Cierra	(912) 678-7273	brcastatesboro@gmail.com	Edit Delete Association
Jackson County	Braselton Christian Academy(942)	401 Zion Church Rd., Braselton	Hooper,Laura	(706) 824-9943	info@braseltonchristianacademy.cor	Edit Delete Association
Atlanta Public Schools	Bright Futures Academy(963)	1300 Joseph E. Boone, Blvd1,Atlanta	Martinez, Andrea	(404) 963-6804	amartinez@bfatl.org	Edit Delete Association
Bulloch County	Bulloch Academy(79)	873 Westside Rd., Statesboro	Collins, Becky	(912) 764-0715	None@none.com	Edit Delete Association
Cobb County	Carmen Adventist School(91)	1330 Cobb Pkwy N,Marietta	Cummings, Calvin	(770) 424-0606	info@caschool.org	Edit Delete Association
Jackson County	Excellence Placed First Private School(205)	531 Ridgewood Dr., Pendergrass	Smith, Stephanie	(678) 579-2929	www.brightday@windstream.net	Edit Delete Association
Dundee	GA School(0800)	dfdfdfd,fgfgfgfg	fgfgf,tests	(232) 323-2323	AGiri@doe.k12.ga.us	Edit Delete Association
Fulton County	Kings Ridge Christian School(863)	2765 Bethany Bend, Alpharetta	Vaughn,Susan	(770) 754-5738	tet@gmail.com	Edit Delete Association
						~
	items per page					1 - 8 of 8 items 💍 🖒

You are logged in as: District User



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# Equitable Services 4 Private Schools (ES4PS)



School Year: 2018 - 2019 - District: Jackson County

You are logged in as: District User

#### Create Invitations Manage Invitation Template

District Name	▼ School Name ▼	Last Invitation Sent Date	▼ Last Invitation Sent By	▼ Invitation Status	▼ Actions
Bulloch County (616)	Bibleway Royal Christian Academy (1161)	10/15/2018 12:54 PM		Sent	View History Resend
Jackson County (678)	Braselton Christian Academy (942)	10/15/2018 12:55 PM	,	Sent	View History Resend
Bulloch County (616)	Bulloch Academy (79)	10/15/2018 12:57 PM	,	Sent	View History Resend
Cobb County (633)	Carmen Adventist School (91)				Create History
Jackson County (678)	Excellence Placed First Private School (205)				Create History
Dundee (645)	GA School (0800)	10/15/2018 09:10 AM		Sent	View History Resend
Fulton County (660)	Kings Ridge Christian School (863)				Create History

1 ► ► 10 ▼ items per page

1 - 7 of 7 items 💍



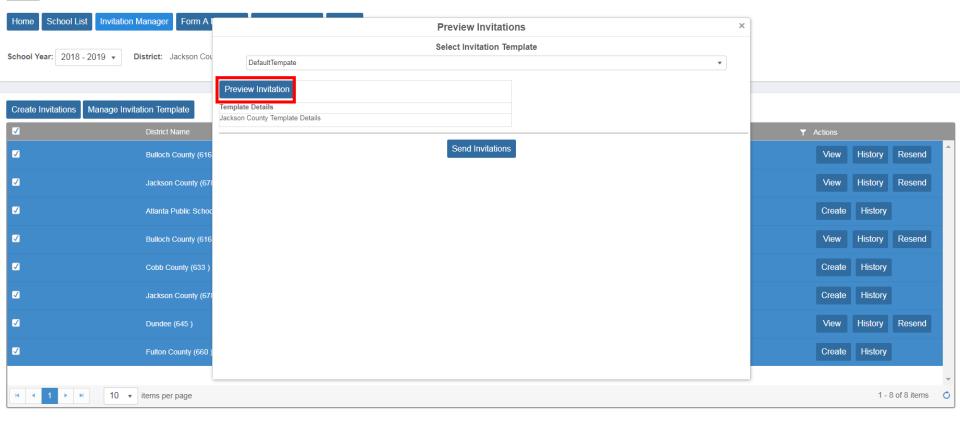
	Home	School List	Invitation Manager	Form A Manager	Form B Manager	Admin 🕶
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School Year:	2018 - 2019 🔻	District:	Jackson County
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You are logged in as: District User

Create Invitations	Manage Invitation Template					
<b>V</b>	District Name	▼ School Name	Last Invitation Sent Date	▼ Last Invitation Sent By	▼ Invitation Status	▼ Actions
	Bulloch County (616)	Bibleway Royal Christian Academy (1161)	10/15/2018 12:54 PM		Sent	View History Resend
	Jackson County (678)	Braselton Christian Academy (942)	10/15/2018 12:55 PM		Sent	View History Resend
	Atlanta Public Schools (761)	Bright Futures Academy (963)				Create History
	Bulloch County (616)	Bulloch Academy (79)	10/15/2018 12:57 PM		Sent	View History Resend
	Cobb County (633)	Carmen Adventist School (91)				Create History
	Jackson County (678)	Excellence Placed First Private School (205 )				Create History
	Dundee (645)	GA School (0800)	10/15/2018 09:10 AM		Sent	View History Resend
	Fulton County (660)	Kings Ridge Christian School (863)				Create History
						•
	10 • items per page					1 - 8 of 8 items 💍

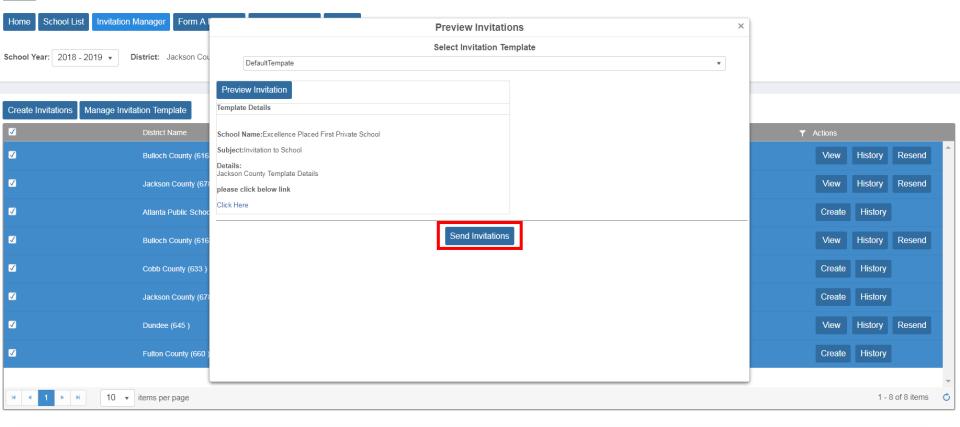






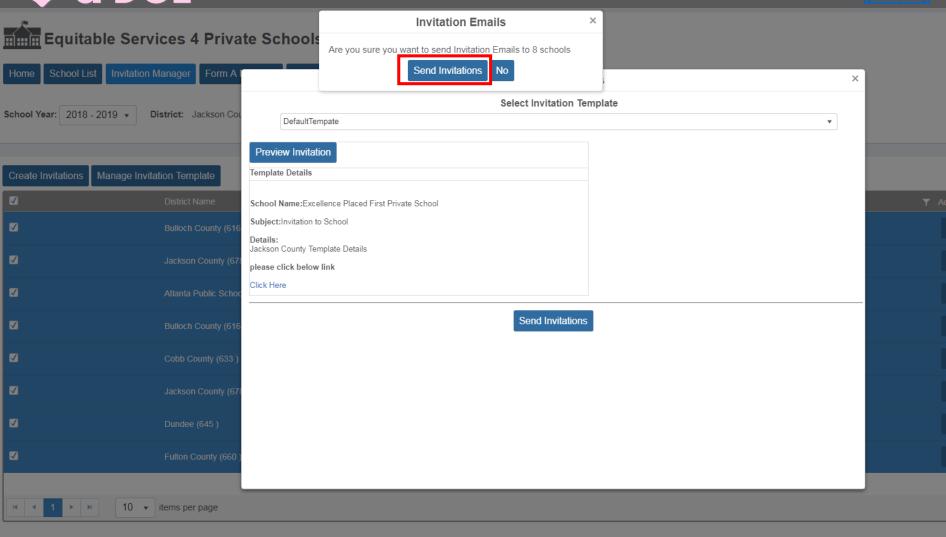
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# Equitable Services 4 Private Schools (ES4PS)



# Richard Woods, Georgia's School Superintendent

"Educating Georgia's Future"







School Year: 2018 - 2019 -District: Jackson County You are logged in as: District User

Create Invitations	Manage Invitation Template					
	District Name	▼ School Name	Last Invitation Sent Date	▼ Last Invitation Sent By	Invitation Status	▼ Actions
	Bulloch County (616)	Bibleway Royal Christian Academy (1161)	10/15/2018 12:54 PM		Sent	View History Resend
	Jackson County (678)	Braselton Christian Academy (942)	10/15/2018 12:55 PM	,	Sent	View History Resend
	Bulloch County (616)	Bulloch Academy (79)	10/15/2018 12:57 PM		Sent	View History Resend
	Cobb County (633)	Carmen Adventist School (91)				Create History
	Jackson County (678)	Excellence Placed First Private School (205)				Create History
	Dundee (645)	GA School (0800)	10/15/2018 09:10 AM		Sent	View History Resend
	Fulton County (660)	Kings Ridge Christian School (863)				Create History

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1 - 7 of 7 items Ç





You are logged in as: District User

#### Add Invitation Template DefaultTempate DefaultTemplateForJacksonCounty 09/28/2018 02:44 PM Edit Delete Invitation to School Delete test sdf asdfasd Edit sadf asdf afds 10/03/2018 09:31 AM 656LASTNAME, 656FIRSTNAME Edit Delete Delete ddfd fdfdf dfdfd 10/03/2018 09:48 AM Edit 1 - 4 of 4 items M 4 ► H 10 • items per page Ċ



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## Richard Woods, Georgia's School Superintendent

*"Educating Georgia's Future"* 

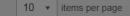
	Create Invitation Templates	×
Equitable Services 4 Priva	Template Name	
Iome School List Invitation Manager Form AI	Template Description	
hool Year: 2018 - 2019 V District: Jackson Cou	Invitation Subject	
Add Invitation Template	Default Template ◎ Yes ® No	
emplate Name Template Des	Invitation Detail	▼ Actions
efaultTempate DefaultTempl:		Edit
sdf		Edit
adf asdf		Edit
dfd fdf		Edit
< < 1 ► ► 10 ★ items per page	Save Cancel	



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Equitable Serv	ices 4 Private Schools (I	ES4PS)		
Home School List Invitation	Manager Form A Manager Form B Ma	anager Admin •		
School Year: 2018 - 2019 •	District: Jackson County		You are logged in as: D	istrict User
Add Invitation Template				
Template Name	▼ Template Description	▼ Template Subject	▼ Last Updated Date	Last Updated by
DefaultTempate	DefaultTemplateForJacksonCounty	Invitation to School	09/28/2018 02:44 PM	
test	sdf	asdfasd	nvitation Template Creation $\times$	
			tion Template Created Successfully!	

		li li	nvitation Template Created Successfully!	
sadf	asdf	afds		656LASTNAME , 656FIRSTNAME
ddfd	fdfdf	dfdfd	10/03/2018 09:48 AM	
т	т	т		



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You are logged in as: District User

#### Add Invitation Template DefaultTempate DefaultTemplateForJacksonCounty 09/28/2018 02:44 PM Edit Delete Invitation to School Edit Delete test sdf asdfasd sadf asdf afds 10/03/2018 09:31 AM 656LASTNAME, 656FIRSTNAME Edit Delete Delete ddfd fdfdf dfdfd 10/03/2018 09:48 AM Edit 1 - 4 of 4 items M 4 ► H 10 • items per page Ċ



# Richard Woods, Georgia's School Superintendent

*"Educating Georgia's Future"* 

_^_	U	Ipdate Invitation Template	×
Equitable Services 4 Priva	Template Name		
Home School List Invitation Manager Form A	DefaultTempate		
	Template Description		
School Year: 2018 - 2019 - District: Jackson Cou	DefaultTemplateForJacksonCounty		
	Invitation Subject		
	Invitation to School		
Add Invitation Template	Default Template		
Template Name Y Template Des	Yes      No     No		▼ Actions
DefaultTemple DefaultTemple	Invitation Detail		Edit
test sdf	Format     ▼     B     I     U     E     E     E     I       Jackson County Template Details		Edit
sadf asdf			Edit
ddfd fdfdf			Edit
тт			Edit
H     1     H     10     ▼       Items per page		Update Cancel	



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Thu 10/11/2018 8:12 AM ES4PSnotifications@doe.k12.ga.us Test2
School Name:First Baptist Church Kindergarten Test2 please click below link Click Here



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School Name: Monroe Country Day School School Address: 603 S. Broad Street Official:Rita

District Name: Charlton County LEA Official:abarar

Invitation Questions

Participate Federal Programs

#### Do you wish to participate in initial consultation?

Yes

◎No ◎Not Known Yet

.

Initial Counseling

Do you wish to participate in federal programs?

Yes

⊙No

Not Known Yet



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⊁



Home	School List	Invitation Manager	Form A Manager	Form B Manager	Admin 🔻

School Year: 2018 - 2019 - District: Jackson County

You are logged in as: District User

District Name	Y School Name	, Form A Sent • Date	▼ Form A Sent By	▼ Form A District Sign Off	▼ Form A School Sign Off	▼ Created Date ↑	▼ Actions	
Atlanta Public Schools	Bright Futures Academy(963)	N/A	N/A	N/A	N/A	N/A	Create Form	•
Fulton County	Kings Ridge Christian School(863)	N/A	N/A	N/A	N/A	N/A	Create Form	
Jackson County	Braselton Christian Academy(942)	N/A	N/A	N/A	N/A	N/A	Create Form	
Jackson County	Excellence Placed First Private School(205)	N/A	N/A	N/A	N/A	N/A	Create Form	
Bulloch County	Bulloch Academy(79)	10/12/2018 2:09PM	637LASTNAME , 637FIRSTNAME	Completed	N/A	10/12/2018 2:09PM	View Form Send Form A Reject	
Bulloch County	Bibleway Royal Christian Academy(1161)	10/12/2018 2:10PM	637LASTNAME , 637FIRSTNAME	N/A	N/A	10/12/2018 8:41AM	View Form Send Form A	
Cobb County	Carmen Adventist School(91)	N/A	N/A	N/A	N/A	10/13/2018 2:44PM	View Form Send Form A Reject	•
H 4 1 H H 10 +	items per page						1 - 8 of 8 items	Q

Submit all forms to State

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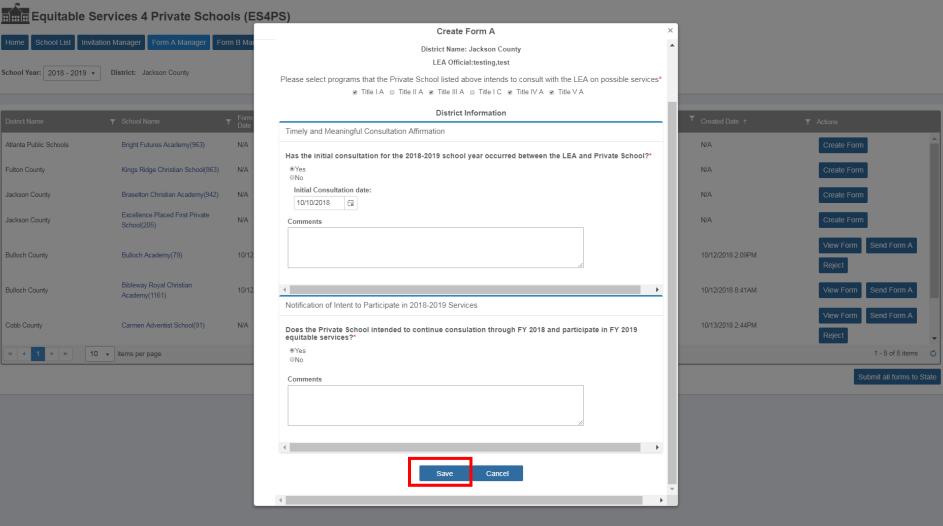
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#### Equitable Services 4 Private Schools (ES4PS)

			Create Form A	×	
Home School List Inv	vitation Manager Form A Manager	Form B Mai	FY 2018 Private School Initial Consultation and Notification of Intent for FY 2018 Provision of Services	<b>^</b>	
School Year: 2018 - 2019	District: Jackson County		School Name: Bright Futures Academy School Address:1300 Joseph E. Boone, Blvd1, Atlanta, GA, 30314 Official:Martinez, Andrea		
District Name	▼ School Name	▼ Form Date	District Name: Jackson County LEA Official:testing,test	▼ Created Date ↑	▼ Actions
Atlanta Public Schools	Bright Futures Academy(963)	N/A	Please select programs that the Private School listed above intends to consult with the LEA on possible services*	N/A	Create Form
Fulton County	Kings Ridge Christian School(863	8) N/A	District Information	N/A	Create Form
Jackson County	Braselton Christian Academy(942	2) N/A	Timely and Meaningful Consultation Affirmation	N/A	Create Form
Jackson County	Excellence Placed First Private School(205)	N/A	Has the initial consultation for the 2018-2019 school year occurred between the LEA and Private School?* ©Yes	N/A	Create Form
Bulloch County	Bulloch Academy(79)	10/12	©No Initial Consultation date:	10/12/2018 2:09PM	View Form Send Form A Reject
Bulloch County	Bibleway Royal Christian Academy(1161)	10/12	Comments	10/12/2018 8:41AM	View Form Send Form A
Cobb County	Carmen Adventist School(91)	N/A		10/13/2018 2:44PM	View Form Send Form A Reject
	10 🔹 items per page				1 - 8 of 8 items
			Notification of Intent to Participate in 2018-2019 Services Does the Private School intended to continue consulation through FY 2018 and participate in FY 2019 equitable services?*		Submit all forms to
			©Yes ©No		
			Comments	•	







Home School List Invitation Manager Form A Manager Form B Manager Adm
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School Year: 2018 - 2019 - District: Jackson County

You are logged in as: District User

District Name	r School Name	Form A Sent Date	▼ Form A Sent By	▼ Form A District Sign Off	▼ Form A School Sign Off	▼ Created Date ↑	▼ Actions
Atlanta Public Schools	Bright Futures Academy(963)	N/A	N/A	N/A	N/A	N/A	Create Form
Fulton County	Kings Ridge Christian School(863)	N/A	N/A	N/A	N/A	N/A	Create Form
Jackson County	Braselton Christian Academy(942)	N/A	N/A	N/A	N/A	N/A	Create Form
Jackson County	Excellence Placed First Private School(205)	N/A	N/A	N/A	N/A	N/A	Create Form
Bulloch County	Bulloch Academy(79)	10/12/2018 2:09PM	637LASTNAME , 637FIRSTNAME	Completed	N/A	10/12/2018 2:09PM	View Form Send Form A Reject
Bulloch County	Bibleway Royal Christian Academy(1161)	10/12/2018 2:10PM	637LASTNAME , 637FIRSTNAME	N/A	N/A	10/12/2018 8:41AM	View Form Send Form A
Cobb County	Carmen Adventist School(91)	N/A	N/A	N/A	N/A	10/13/2018 2:44PM	View Form Send Form A Reject
H - 1 - H 10 -	items per page						1 - 8 of 8 items 🕻

Submit all forms to State



Equitable Se	rvices 4 Private Scho	ols (ES4PS)			
Home School List Invitati	on Manager Form A Manager Fo	orm B Manager Admin -			
School Year: 2018 - 2019 +	District: Jackson County			You are logged in a	s: District User
District Name		▼ Form A Sent Date	▼ Form A Sent By	▼ Form A District Sign Off	▼ Form A School Sign Off
Bulloch County	Bibleway Royal Christian Academy(1161)	10/12/2018 2:10PM	637LASTNAME , 637FIR	STNAME N/A	N/A
Jackson County	Braselton Christian Academy(942)	N/A	N/A	N/A	N/A
Atlanta Public Schools	Bright Futures Academy(963)	10/15/2018 2:27PM		N/A	N/A
Bulloch County	Bulloch Academy(79)	10/12/2018 2:09PM	637LASTNAMI	Form A Invitation ×	N/A
Cobb County	Carmen Adventist School(91)	N/A	N/A	IN/PS	N/A
Jackson County	Excellence Placed First Private School(205)	N/A	N/A	N/A	N/A
H - 1 - H 10	▼ items per page				



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FILE MESSA	GE McAfee E-mail Scan						
fignore X ↓ Junk • Delete	Reply Reply Forward All	Image: Move to: ?       Image: Comparison of the comparison o	× •	Move	Assign Mark Categorize Policy - Unread	Follow Up •	Zoom
Delete	Respond	Quick Steps	G	Move	Tags	🖙 Editing	Zoom
E	и 10/11/2018 12:05 рм S4PSnotifications@dc orm A Invitation	e.k12.ga.us					

Form A Invitation please click below link

https://uatmsweb09.doe.k12.ga.us/ES4PSWeb/FormAManager/PrivateSchoolFormA?Guid=d5207023-9e20-4588-8ad2-37802fbdbaf2



## Richard Woods, Georgia's School Superintendent

"Educating Georgia's Future"

FY 2018 Private School Initial Consultation and Notification of Intent for FY 2018 Provision of Services

School Name: Charlton Christian Academy

School Address:55 Reynolds Rd., Folkston, GA, 31537

Official:Albritton, Spike

**District Name:** 

LEA Official:

Please select programs that the Private School listed above intends to consult with the LEA on possible services\*

🗷 Title I A 🔍 Title II A 🔍 Title III A 🖉 Title I C 🔍 Title IV A 🔍 Title V A

**School Information** 

Timely and Meaningful Consultation Affirmation

Has the initial consultation for the 2018-2019 school year occurred between the LEA and Private School?\*

Yes

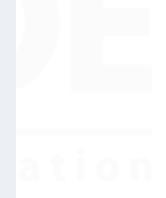
⊙No

Initial Consultation date\*:

10/15/2018

Comments







	articipate in 2018-20				
Does the Private School TY 2019 equitable service	intended to continu es?*	e consulation thro	ugh FY 2018 and pa	rticipate in	
Yes					
©No					
Comments					
				;	
				•	
Sign Off					
School Comments*					
School Comments*				- r	
School Comments*					
School Comments*					
	Albritton, Spike				
School Official Name:	Albritton, Spike			/	
	Albritton, Spike				



►

District Information				
Timely and Meaningful Consultation Affirmation				
Has the initial consultation for the 2018-2019 school year occurred between th Private School?*	e LEA and			
® Yes				
©No				
Initial Consultation date*:				
10/15/2018				
Comments				
	11			
Notification of Intent to Participate in 2018-2019 Services				
	d participate in			
Does the Private School intended to continue consulation through FY 2018 an	d participate in			
Does the Private School intended to continue consulation through FY 2018 an FY 2019 equitable services?*	d participate in			
Does the Private School intended to continue consulation through FY 2018 an FY 2019 equitable services?*	d participate in			
Does the Private School intended to continue consulation through FY 2018 an FY 2019 equitable services?* <sup>©</sup> Yes	d participate in			
Does the Private School intended to continue consulation through FY 2018 an FY 2019 equitable services?* <sup>O</sup> Yes <sup>®</sup> No	d participate in			
Does the Private School intended to continue consulation through FY 2018 an FY 2019 equitable services?*	↓ d participate in			
Does the Private School intended to continue consulation through FY 2018 and FY 2019 equitable services?* •Yes •No Comments	d participate in			
Does the Private School intended to continue consulation through FY 2018 and FY 2019 equitable services?* •Yes •No Comments	d participate in	) a t	ic	



	•
Notification of Intent to Participate in 2018-2019 Services	
Does the Private School intended to continue consulation through FY 2018 and participate FY 2019 equitable services?*	in
● Yes	
® No	
Comments	
TEST COMMETNS	
	<u> </u>
Sign Off	
District Comments*	
District comments	
SIGNED OFF	
LEA Official Name: abarar,Hohn	
Title:	
Date*:	
10/15/2018	
4	L F
Save Sign Off	

s School Superintendent Educating Georgia's Future"



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Equitable Services 4 Private Schools (ES4PS)													
Home School List Invitation Manager Form A Manager Form B Manager Admin •													
School Year: 2018 - 2019 🔻	2018 - 2019 • District: Atlanta Public Schools			You are logged in as: District User									
District Name	▼ School Name	Form A Sent Date	▼ Form A Sent By	▼ Form A District Sign Off	▼ Form A School Sign Off	▼ Created Date	▼ Actions						
Atlanta Public Schools	Christ the King(110)	10/22/2018 12:17PM	THOTAKURA , ARAVIND	Completed	Completed	10/22/2018 12:37PM	View Form Send	i Form A	*				
Dundee	GA School(0800)	10/22/2018 12:17PM	THOTAKURA , ARAVIND	Completed	Completed	10/22/2018 12:34PM	View Form Send	I Form A					
Dundee	Georgia Military College Prep.(248)	10/22/2018 12:17PM	THOTAKURA , ARAVIND	Completed	Completed	10/22/2018 12:16PM	View Form Send	Form A					
									-				
	) 🔻 items per page						1 - 3	3 of 3 items	Q				
	Submit all forms to State												



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# Thank you!



Gaboe

Richard Woods, Georgia's School Superintendent *"Educating Georgia's Future"* 

gadoe.org

The Every Student Succeeds Act (ESSA) established a new grant, Title IV, Part A, Student Support and Academic Enrichment (SSAE). SSAE supports three major strategies:

with community partners



# ducation