National ESEA Conference 2020: Conversation with Private School State Ombudsman

Thursday, February 6, 2020 – Room A402/403 – 3:30 p.m. – 5:00 p.m.

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Scenario #1: Title IA District Grade Band participation

The Sunshine School District has one elementary building and is Title IA served. Saint Rays of Sun is a private school located in the Sunshine district. Sunshine targets its Title IA funds in the grade bands of first and second in the area of math.

Saint Rays of Sun wants to serve its Title IA eligible students in third grade from Sunshine in the area of reading.

Is this an allowable use of funds? Why? What is the policy in this scenario?

Scenario #2 Title I, Part A Parent Engagement

In timely consultation, Sunshine and St. Rays of Sun plan an award night for students graduating out of the Title I, Part A program at St. Rays of Sun.

Is this an allowable use of Title I, Part A Parent Engagement equitable services share?

Scenario #3 Title I, Part A Parent Engagement

In consultation with Sunshine, the principal of St. Rays of Sun requests to use some Title I, Part A parent engagement funds for equitable services to host a parent curriculum night for its families. The Title I funded teacher also plans to participate in that curriculum night by providing a “make it take it” literacy activity in her Title I space.

Can Sunshine approve this request as an allowable use of parent engagement funds? Why? Why not?

Scenario #4: Paraprofessionals in the Title I, Part A Program

The Good Hope School has contacted an LEA and requested that a “highly qualified” support staff employed by the private school be able to provide instructional services for Equitable Services. This staff member would act as a paraprofessional and would be supervised via Skype by a board member of the private school.

Is this allowable?
**Scenario #5: Title I, Part A Professional Development**

In consultation with Sunshine, St. Rays of Sun has identified that its second graders are not successfully meeting the academic standards for their grade level based upon test scores. St. Rays has a limited amount of Title I, Part A funds and requests to send third grade staff to a reading workshop, which would expend all of its Title I, Part A equitable services share.

Would this be an allowable use of Title I, Part A funds?

What if the private school wanted to use Title II, Part A funds in Scenario #5 instead of Title I, Part A funds?

**Scenario #6 Title II, Part A Professional Development**

St. Rays of Sun is requesting to attend a national faith-based conference. The request was submitted in a timely manner. The conference attendees will participate in both secular and religious based content sessions.

*Can this conference be eligible for Title II, Part A funds? If so, how can this request be approved and processed?*

If not eligible, for what reason?

**Scenario #7: Title IV, Part A and Private School Equitable Services**

An LEA wants to increase Title I, Part A campus services by transferring 100% of Title IV, Part A program funds. During consultation with the LEA, St. Rays of Sun private school shared it does not plan to participate in Title I, Part A. However, St. Rays of Sun has generated a large Title IV, Part A equitable services share. After a comprehensive needs assessment and data analysis, the private school would like to use Title IV, Part A equitable services on well-rounded education for its students.

May the LEA still transfer 100% of the Title IV, Part A funds into Title I, Part A after hearing the private school has a plan based on data? Why or why not?