



Ensuring Equitable Services to Private Schools

Title II, Part A, Teacher and Principal Training and Recruiting Fund

*Under the Elementary and Secondary Education Act of 1965 (ESEA),
as reauthorized by the
No Child Left Behind Act of 2001 (NCLB)*

Virginia Department of Education
February 19, 2014

Overview of ESEA Provisions for Private Schools

ESEA (Sections 1120 and 9501) requires that access to equitable services be offered to:

- **Eligible students;**
- **Their parents (Title I applicable);**
- **Teachers; and**
- **Other educational personnel.**



Services are to be supplemental to core instruction and services offered by private schools

- **No funds go directly to private schools or general needs of private schools**
- **Participation by private schools *not* required**

ESEA Requirements Regarding Equitable Services

The Uniform Provisions in Title IX, Part E, Subpart 1, of ESEA govern the participation of private school students and teachers in certain programs.



Title I, Part A, (Section 1120) has its own provisions governing private school participation.

Student, Teacher, and Principal Eligibility

Private school students, teachers, and principals in nonprofit private elementary and secondary schools, including religiously affiliated schools, are eligible under the *same conditions as the federal program allows for public school students, teachers, and principals.*



Uniform Provisions of Title IX

Eligibility and participation requirements *differ* from program to program.

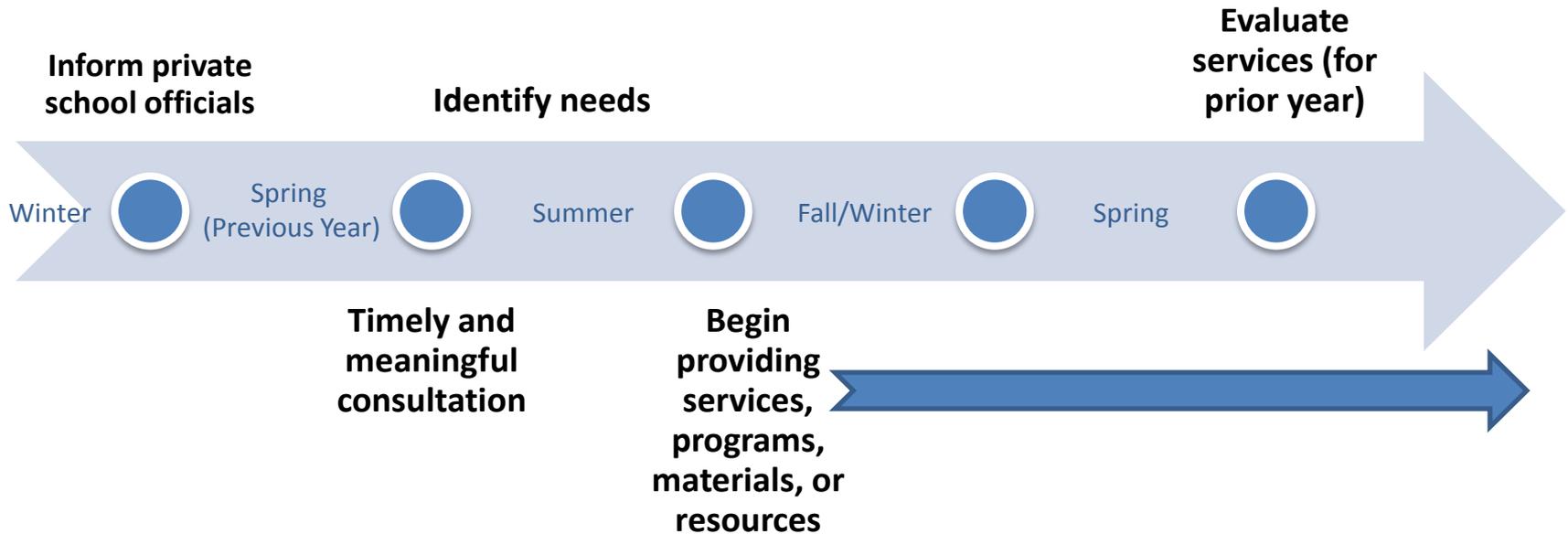


All Programs Require...

**Timely and Meaningful
Consultation**



Suggested Consultation Timeline



Equitable Services

Provide services that are allowable and comparable to those provided to public school students and teachers participating in the program

Can be different from those provided to public school participants

Needs of private school students and teachers must be assessed and evaluated

No funds are provided directly to private school

Programs Governed by the Uniform Provisions of Title IX

- Title I, Part C, Migrant Education
- Title II, Part A, Teacher and Principal Training and Recruiting Fund
- Title II, Part B, Mathematics and Science Partnerships
- Title III, Part A, English Language Acquisition, Language Enhancement, and Academic Achievement
- Title IV, Part B, 21st Century Community Learning Centers

Programs No Longer Funded

- Title I, Part B, Subpart 1, *Reading First*
- Title II, Part D, *Enhancing Education through Technology*
- Title IV, Part A, *Safe and Drug-Free Schools and Communities*
- Title V, Part A, Innovative Programs

Programs not under Title IX

- Title I, Part A - Improving Basic Programs Operated by Local Educational Agencies

Overview of Equitable Services for the Following



Title II, Part A - Teacher and Principal Training and Recruiting Fund

Eligibility for Services Under Title II, Part A

For Title II, Part A, the following staff members MAY be eligible for services, based on needs assessment:

- **Teachers in federal core content areas*;**
- **Teachers of special populations;**
(special education, gifted, English language learners);
- **Principals and/or other instructional leaders; and**
- **Paraprofessionals or other instructional personnel**
(consult with school division to ensure allowability).

**Federal core content areas include the following: English/language arts/reading; mathematics; science; history, geography, civics, economics, government; foreign language; the arts.*

Title II, Part A - Provision of Services to Private Schools:

Services and benefits provided to private school students must be secular, neutral, and nonideological.

Services and materials that are purchased or provided on behalf of the private school must be necessary for carrying out professional development activities.

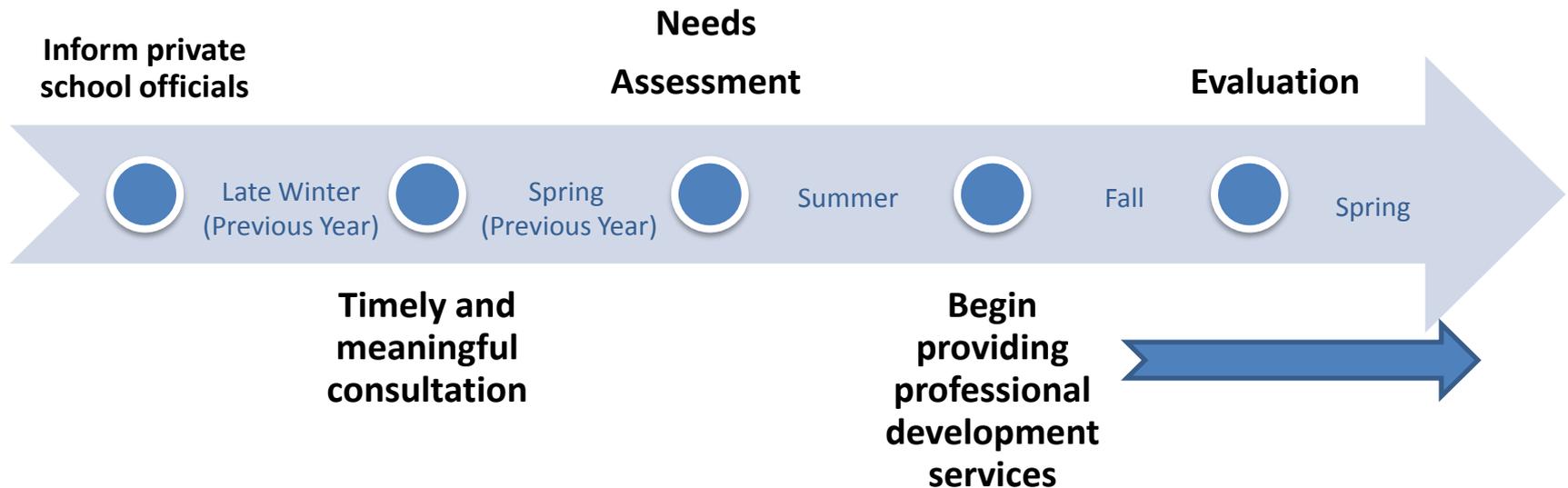
Consultation Process

How and where services are provided is determined through consultation with private school officials.

If needs are similar between public and private schools, public and private school teachers may participate jointly in professional development activities.



Consultation Timeline



Examples of Professional Development Activities

Must be
Secular, Neutral, Non-Ideological

Content-specific professional development (federal core content areas*)

Instructional Teaching Strategies

Classroom Management/Improving Student Behavior

Working with Students with Different Needs/Differentiation Strategies

Instructional Leadership

Integrating Technology into the Curriculum/
Data Analysis

**Federal core content areas include the following: English/language arts/reading; mathematics; science; history, geography, civics, economics, government; foreign language; the arts.*

Possible Service Delivery Methods

Coursework
(through accredited
university)

Onsite/Off-site
workshops; conferences

Virtual courses/PD
activities

Onsite
coaching/mentoring
(Personnel may only be
hired by public schools
and under their direction)

All services must be tied to
needs assessment

Public schools are responsible for
providing/paying for services. Requests for
services **MUST** be discussed in advance.

Ensuring Productive Meaningful Consultation

Possible Areas to Review

Student
Achievement data

Professional
Development
survey responses/
Teacher requests

Numbers of
current/projected
new teachers (0-3
years)

Teacher/Principal
Evaluation findings

Professional
Development Plan
(if applicable)

Names of possible
vendors/service
providers if
available

School
calendar/desired
timeframe for
services

Student enrollment
figures (K-12 for
Title IIA)

Example Needs Assessment

Grade	Student Needs	Teacher Strengths	Teacher Areas of Need	Proposal for Professional Development	Estimated Cost
Grade 3	Reading for comprehension; Increasing time on task	Excellent classroom management; creative approach to learning	Reading in the content area for at-risk students	Local university course, "Applying New Reading Research to Instruction in Content Areas for Low-achieving Students"	\$1,150
Grade 2	Reading fluency	Reading in the content areas	Analysis of and correction of reading problems	Quarterly in-service training with LEA reading specialist to develop skills to analyze reading problems	\$800 per person (when there is a class of 10 individuals)
Grade 1	Letter recognition; Lack of phonic skills	Reading in the content areas	Phonics-based instruction	Quarterly in-service training with LEA reading specialist or 3-credit course at the local teachers' college	\$800 \$900 for 3 credits for local university course

Managing Expenditures on Behalf of Private Schools Under Title II, Part A

The school division remains in control of federal funds and maintains ownership of any materials or equipment purchased with such funds.

Upon **pre-approval**, reimbursements may be made to INDIVIDUAL teachers/principals. However, it is never permissible to reimburse a private **school** for expenses incurred.

Ensuring Productive Meaningful Consultation

Topics to Cover:

What is the purpose of Title IIA, and how may it be used with private schools?

What types of services are available?

Which staff members may be able to receive services?

What kind of paperwork may be needed? (i.e., needs assessment, student enrollment) Private schools should NOT be asked to fill out purchase orders.

What is the process a private school should use for obtaining services?

What is the timeline for services?

What is the estimated value of services that may be available?

Frequently Asked Questions

Title II, Part A

1) How is the value of Title II, Part A, services calculated for each participating private school?

Response

- The value of Title II, Part A, services for private schools is calculated on a per-pupil basis for each participating private school *to the extent that the school division uses its funds for professional development.*
- The per-pupil calculation is based on the number of K-12 students in both the public and participating private schools located *within the geographic boundaries* of the school division.

Frequently Asked Questions

Title II, Part A

2) May Title II, Part A, funds be used to pay for a private school teacher's attendance at a professional conference sponsored or conducted by a faith-based organization?

Response

- Yes. To the extent that the conference is part of a sustained and comprehensive **secular** professional development plan for the teacher, then Title II, Part A, funds may be expended to pay for the **portion** of the costs of the conference that, as determined by the LEA, represent the secular professional development in which the teacher participated.
- In this case, an individual teacher would need to pay for attendance at the conference, submit documentation about sessions attended, and the LEA would pay or reimburse the teacher for attendance at the conference in the appropriate amount.

Frequently Asked Questions

Title II, Part A

3) If a private school official requests that certain services be delivered through a particular third party and the LEA chooses not to do so, what should the division include in the written explanation as to the reasons why it chose not to grant that request?

Response

- ESEA requires a division to provide a “written explanation of the reasons” why it chose not to use a specific third party for services.
- An adequate explanation would address concerns expressed by private school officials about the division’s direct services and fully explain the reasons why the division chose not to use a third party.

Frequently Asked Questions

Title II, Part A

4) Who may serve as the private school official representing the private school in meaningful consultation meetings?

Response

- Most often, the principal of the private school is the designated representative for consultation.
- The principal may designate another individual at the school.
- A group of principals may designate an individual to represent them.*
- An official from a group of similarly-affiliated schools within a division may be designated. (i.e., a diocesan representative) *

*Note: if someone other than the principal will represent the school or a group of schools, notification should be sent in writing to the division's superintendent and Title II, Part A coordinator.

Frequently Asked Questions

Title II, Part A

5) May private schools within the same school division request that the school division “pool” funds for services?

Response

- Yes, funds for schools within the same school division may be pooled.
- Funds may NOT be pooled across different school divisions.
- If some schools wish to pool funds and others do not wish to pool, that is acceptable.

Frequently Asked Questions

Title II, Part A

6) Does the professional development program for private school teachers have to be the same as the professional development program for public school teachers?

Response

- No. School divisions must assess the needs of private school teachers in designing the professional development program for private school teachers. If the professional development needs of the private schools are different from those of the public school teachers, the school division, in consultation with private school representatives, should develop a separate program.

Frequently Asked Questions

Title II, Part A

7) May a school division place a blanket restriction on activities for private school teachers, such as not allowing graduate courses or out-of-state professional development?

Response

- No. While a school division may choose to set restrictions on otherwise allowable Title II, part A, activities for public school teachers, it may not impose those same restrictions on private school teachers.
- Nevertheless, the professional development activity must be otherwise allowable, **reasonable, and necessary** in meeting the needs of private school teachers and principals.

Frequently Asked Questions

Title II, Part A

8) If a private school requests it, may a school division write a reimbursement check to a private school from Title II, Part A, funds?

Response

- No. It is never permissible to reimburse a private school for services or materials it has purchased.
- Upon PRE-APPROVAL, a school division may reimburse an **individual** private school teacher or principal for participation in approved professional development activities.

Information on Equitable Services

Home » Federal Programs » ESEA (NCLB) Staff Contacts | Search VDOE GO

FEDERAL PROGRAMS

ELEMENTARY & SECONDARY EDUCATION ACT (ESEA)

Professional Development ⓘ

February 2014 – Technical Assistance Webinars for school divisions and private school officials in understanding equitable participation requirements for private school students, teachers and other educational personnel in applicable [ESEA](#) programs. See [Superintendent's Memo, January 24, 2014](#).

VDOE assists schools and school divisions in administering programs authorized by the federal Elementary and Secondary Education Act (ESEA) – the most recent reauthorization of which is also known as the No Child Left Behind Act of 2001.

ESEA requires states to set annual objectives for increasing student achievement with the goal of ensuring that all children have an opportunity to obtain a high-quality education. Schools, school divisions and states that meet these objectives make what the law refers to as "Adequate Yearly Progress."

Each of the ten titles or chapters of the law pertain to a different set of programs where federal funding is authorized for improving public education and achieving the objectives of the law.

Professional development

! **Virginia's ESEA Flexibility**

Virginia, under ESEA waivers granted by the US Department of Education, established Annual Measurable Objectives (AMOs) in English and mathematics.

[More about ESEA Flexibility >>](#)

Federal Programs

- ESEA Flexibility
- Title I: Improving the Academic Achievement of the Disadvantaged
- Title II: Preparing, Training & Recruiting High Quality Teachers & Principals
- Title III: Language Instruction for Limited English Proficient & Immigrant Students
- Title IV: 21st Century Schools
- Title V: Promoting Informed Parental Choice & Innovative Programs
- Title VI: Flexibility & Accountability
- Title VII: Indian, Native Hawaiian & Alaska Native Education
- Title VIII: Impact Aid Program
- Title IX: Equitable Services to Private Schools**
- Title X, Part C: Homeless

http://www.doe.virginia.gov/federal_programs/esea/title9/index.shtml

Questions about Equitable Services Under Title II, Part A



Program-Specific Contact Information at VDOE

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