

Louisiana Believes

Non-Public Updates LASAFAP Spring Conference 2018

KUDOS!!

- **Thank you for reaching out to the Non-Public Schools before contacting us with concerns or informal/formal complaints!**
 - **We are asking both our School Systems and Non-Public Schools to follow the same protocol:**
 - **1st – Collaborate with Non-Public/Private School**
 - **2nd – Contact State Ombudsman/ Federal Programs Department**
 - **3rd – State Ombudsman/Federal Programs Department will contact the U.S. Dept. of Education**
- Your input truly helps! You are a key factor in assisting us with resolving concerns/issues, as well as, bridging the communication gaps.**

WE TRULY APPRECIATE YOUR TIME AND COOPERATION!!

WE ARE ONE!...

- **TEAM WORK AND MENTORING ARE A VITAL PART OF EQUITABLE SERVICE PROGRAM...**

WE HAVE A LOT OF NEW FEDERAL PROGRAM DIRECTORS AND CO-HORTS WHO ARE NEW TO NON-PUBLIC PROGRAMS

AND... WITH ESSA, EVEN THOSE OF US WHO ARE VETERANS ARE LEARNING TO IMPLEMENT THE NEW LAWS AND NON-REGULATORY GUIDANCES

REMEMBER... TEAM WORK REALLY DOES MAKE THE DREAM WORK!

STATE OMBUDSMAN

- **Ombudsman is required to monitor and enforce the equitable services requirements under Titles I and VIII (Titles II, III, & IV) and have a significant role in the state’s monitoring process.**
- **Sections 117(a)(3)(B) and 8501(a)(3)(B)**



Ombudsman Overall Goals:

- **To establish compliant and effective LEA/School Systems equitable services programs through encouraging/establishing workable agreements between the LEAs/School Systems and the Non-Public/Private Schools.**
- **Develop statewide documents to create a cohesive framework for implementing ESSA equitable services programs**
- **Offer technical assistance and support 1st before involving the state or federal monitoring teams**

OUTREACH...

- **Work Group consisting of LEA/School System and Non-Public personnel.**
- **Webinars**
- **Podcast**
- **Conference Calls**
- **Surveys**

Technical Assistance

- **Is an on-going event!**
- **To date we have addressed over 50 informal cases**
- **New cases come in weekly**
- **Keep in mind we want to keep the cases in the informal complaint process**
- **Meaningful Consultations/Site Visit/Walk – throughs**



Flexible Timeline for LEA/School System Meaningful Consultations

EQUITABLE SERVICES MEANINGFUL CONSULTATION CHECKLIST

- **The checklist is used to assist LEAs/School Systems and Non-Public/Private Schools with maintaining compliance under the ESSA Act of 2015.**
- **Use this document with your Non-Public Federal Programs Team and Non-Public Schools during team meetings and consultations**
- **This document will assist you with having a transparent meaningful consultation**
- **But overall it will prepare you for state and federal monitoring**

LET'S REVIEW THE DOCUMENT...

RADAR ITEMS, RED FLAGS & ELEPHANTS... OH MY!

- **Initial Timely and Meaningful Consultations & Documentation**
- **Meaningful Consultations/Ongoing Consultations**
- **Transparency**
- **Administrative Cost**
- **LEAs/School Systems Ceding Control of Title I Program**
- **LEA Title I Program Design**
- **3rd Party Contracts; Retired Tutors; LEA/School System Employees; Non-Public/Private School Teachers**

CONT...

- **Title IV...**
- **Formula will be included in the new eGMS just like Title II**
- **If LEA/School System transfer funds you still must give Non-Public Schools their equitable share.**
- **Cannot transfer allocation from NP Title IV to Title I NP Title I and VIII (Titles II, III, and IV)**
- **If a Non-Public school chooses not to participate after allocations have been determined you do not reduce the amount of the total/overall allocation. The LEA/School System redistributes the amount to the participating Non-Public schools. (As per our 3/21/18 Webinar with Federal Programs**

IT'S STILL HOT!...

- **Rate of Pay for Tutoring vs Student Services**
- **Materials and Supplies/Inventory**
- **Designated Room/Area**
- **Non-Public Plans – NO! Needs Assessment/Activity Chart/Plan – YES**
- **Income Survey**
- **Enrollment Counts**
- **Regular Monthly, Quarterly Transparent Budget Updates**
- **Document, Document, Document... If It's Not Documented & You Have No Proof... It Did Not Happen!**

MY LOTTO!!

- You Have 1 Minute to Form A Group...
- You Have 1 Minute to Chose A Lotto Agent for Your Group
- Lotto Agent Opens the Envelope and Follows the Directions...

OH HAPPY DAY!

Ombudsman is the Lottery CEO...



MONEY, MONEY, MONEY!! IT'S MINE!!

MY LOTTO!

**How Much Money Do You Have?
Discuss How Are You Going To Spend It...
(You have 3 minutes)**

**WE ARE NOT IN HOUSTON BUT...
LASAFAP WE HAVE A PROBLEM!...**

**The Lotto CEO Has An Important Message
That Calls For Immediate Attention!!**

HOLD UP! YOU ARE...



TRAVEL ADVENTURES IN THE LIFE OF AN OMBUDSMAN...

- **So Let's Talk Travel!...**
- **Yes Non-Public Schools Need to Get Travel and Professional Development In On Time**
- **Yes We Need To Monitor & Update Their Needs Assessment/Activity Chart/Plan On a Regular Basis**
- **Yes It Must Be In Accordance To The Non-Public Schools PD Needs and Not The LEA/School System**
- **Yes Non-Public May Attend Religious Conferences and NO You Can Not Pay For The Religious Activities**

TRAVELING ADVENTURES CONT...

- **Yes This Is How We Will Calculate Travel For Religious Conferences...**
 - **Count the total number of sessions/activities on the FULL Agenda**
 - **Count the total number of sessions/activities that are religious, have religious content, etc.**
 - **Calculate the % of religious related activities and this is the percent you deduct from the TOTAL TRAVEL...**
 - **Keep In Mind We Are Strongly Encouraging The Use Of The Allocation...**
 - **Ask where the Non-Public Schools would like to deduct the percentage from... food, misc., etc.**
 - **Start with the smaller items such as misc., food, parking, mileage, travel, etc.**
 - **Pay for the larger expenses ... registration, hotel, travel, etc. WHY??**

The BIGGEST ELEPHANT OF THEM ALL...

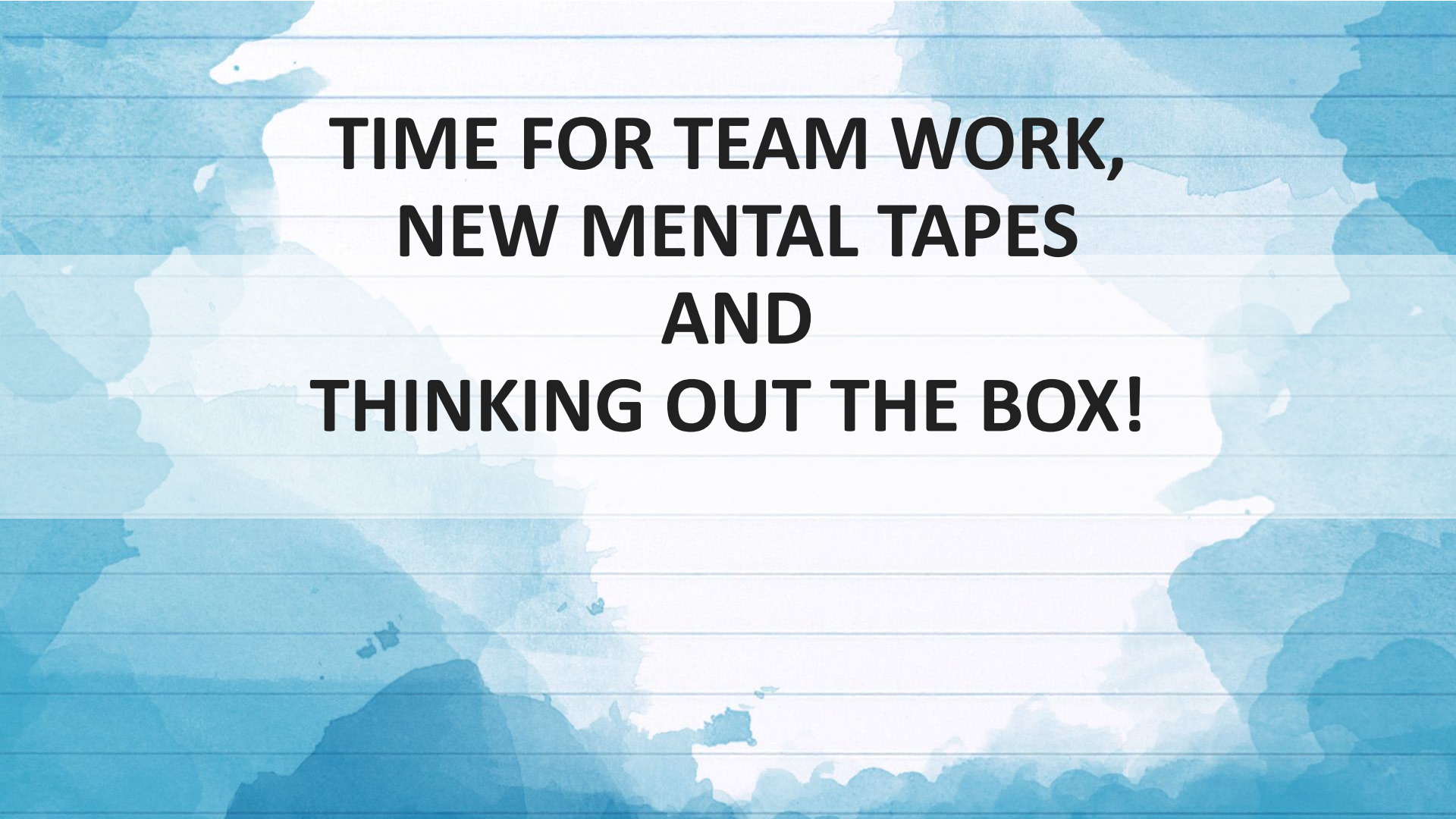
- THE DEAD ZONE; THE TRANSITION TIME; YOU DIDN'T USE IT SO YOU LOOSE IT TIME!!!**

Somebody! Everybody!... SCREAM!!!

Before We All Talk at Once Let's Reflect On How We Felt When The Lotto CEO Took Your \$500.00

This Is How Non-Public and Public School Teachers/Administrators Feel!

IT'S MINE!!!!....



**TIME FOR TEAM WORK,
NEW MENTAL TAPES
AND
THINKING OUT THE BOX!**

**Is It The Dead Zone, Transition
Time or _____
You Name It!?**

6/30 PER – 9/30 PER Equitable Services

- The LEA will determine the prior year funds/allocation for Non-Public Schools from Federal resources
- The totals should align with the LEA's 6/30 PER
- The LEA must articulate these balances transparently to the Non-Public Schools if applicable
- Yes in Louisiana the books, accounts, fiscal records, etc. are technically closed but, by federal law the balances should be available for Non-Public equitable services from June 30th – September 30th...Yes for Public Schools too!
- Bottom Line... The Current Year Ends September 30th of each year not June30th
- And Yes We Are Working With Our Finance Office

Let's Work Together And Try This...

- **Think First In First Out... FIFO**
- **Budget person initially charges travel to current year preliminary award/funds**
- **Budget person will internally deduct from prior year balances and keep a record**
- **As of the 9/30 PER, LEA needs to determine if there are any remaining funds available for the Non-Public Schools. This will be Non-Public schools true carryover which may be affected by extenuating circumstances.**
- **Keep in mind... the LDOE pulls from old funds once a budget is submitted including the prior year funds from the LEA.**

Cont....

- The new eGMS will have an area for your district to capture Non-Public Prior Year Funds after the 6/30 PER is approved for Titles I, II, and IV.
- Example... The Non-Public school's proportionate share for the current year is \$100,000.00
- Therefore, if the Non-Public School has, \$2000.00 left from Prior Years Funds for Professional Development designated for a June 29 – July 3rd Conference, then this amount will be added to the \$100,000.00 allocation for the next school year.
- The LEA/School Systems budget staff will internally account for the PD from the \$2,000.00, Prior Year Funds.
- Although the district will be using the current year codes to account for the Prior Year Funds, the LDOE (Louisiana Dept. of Education) will use the FIFO process when the funds are reimbursed to the LEA/School System.
- Rather than the Non-Public School having just the \$100,000.00 of current funds, it has an additional \$2,000.00 from Prior Year Funds which gives the Non-Public a current year allocation of \$102,000.00 until September 30th.

OH NO THERE ARE STILL FUNDS LEFT!...

- Let Non-Public school know Immediately and give a reasonable deadline after 6/30 PER Approval.
- Make Suggestions... Purchase Items for PD, Collaboration, Team Meetings, etc. Such as: Large post it pads, teacher resource books, binders, etc. for PD use and not for classroom use.

New Carryover Update From The Federal Government (3/2018)

If Non – Public has allocations left from the current year it does not revert to the LEA/School System; it is considered carryover for the Non-Public schools for the current year.

- Extenuating Circumstances – School closure, fire, storm, natural disaster, significant documented issues with 3rd party contractors, students drop/transfer (small districts), etc.
- Extenuating Circumstance is not the LEA failing to start the equitable services on time.

Non-Public Schools Are Being Held Accountable For...

Submitting...

- **Required Non-Public Equitable Services Documentation On Time**
- **Needs Assessments/Activity Charts/Plans for Titles II & IV**
- **Professional Development Documentation On Time for Approval and Reimbursements**

Adhering to...

the Equitable Services Compliance Guidelines for Titles I and VIII to Assist with Maintaining Effective Non-Public Programs

REMEMBER...

Stay Legal and Think Out The Box!
Be Creative!

**It Is The LEAs'/School Systems'
Responsibility!!**

RESOURCES and Tips...

- **Please Know... Federal Law Changes All the Time...**
- **Federal Law is not always just black and white. There are a lot of gray areas.**
- **You must stay abreast by participating in professional development sessions such as: LASAFAP, Title I Conferences, Brustein & Manasevit Sessions, webinars, reading non-regulatory guidance, adhering to technical assistance, etc. It is all to help our LEAs/School Systems remain compliant.**
- **Networking and collaborating with members of other state and local Federal Programs Teams**

Reference Books by Jeanne C. Sweeney, M.P.A., LRP Publications

- **Serving private School Students, Families and Teachers: A Compliance Guide for Title I Practitioners – Second Edition**
- **What Do I do When... The Answer Book on Title I – Third Edition**

THANKS FOR ALL YOU DO!! This Gift Is For YOU!!

Flexible Timeline Wall Calendar!

Louisiana Believes

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