



PUBLIC SCHOOLS OF NORTH CAROLINA

DEPARTMENT OF PUBLIC INSTRUCTION | Catherine Truitt, *Superintendent of Public Instruction*

WWW.DPI.NC.GOV

To: Federal Program Directors of School Districts in North Carolina

From: Federal Programs Monitoring and Support Division
North Carolina Department of Public Instruction

Date: April 29, 2021

Subject: **Identifying Needs, Eligible Students and Services at Private Schools per ESEA**

Overview

As described in [Setting the Agenda for Equitable Services Consultations \(3/23/21\)](#), the annual initial consultation meetings are intended to allow district and private school officials to identify specific needs that may be addressed with equitable services and ways to assess the effectiveness of those services. This memo provides additional information about how these topics should be addressed for each of the grants subject to equitable services by the Elementary and Secondary Education Act (ESEA).

The identification of students who are eligible to receive services under the various grants should not be confused with the determination of proportionate shares. The Proportionate Share Calculator on [the DPI Equitable Services web page](#) provides directions and determines the shares based on a few simple inputs. The calculations should be completed no later than May 30.

Identifying Needs and Services

Private schools in North Carolina set their own academic standards and are not required to implement *The North Carolina Standard Course of Study*. In addition, a private school accepting equitable services is not required to conduct the type of needs assessment required of a district's Title I-A school. However, they should be able to describe, in measurable terms, the needs that can be addressed through the grants in which they choose to participate. Unlike the calculations of proportionate shares (which are finalized prior to the end of May), the identification of needs and students is subject to reasonable adjustments based on ongoing consultation throughout the grant implementation in the upcoming year. Considerations for determining needs within each of the grants are explained in the following paragraphs.

FEDERAL PROGRAM MONITORING AND SUPPORT DIVISION

6307 Mail Service Center, Raleigh, North Carolina 27699-6307 | (984) 236-2786 | Fax (984) 236-2099

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER



PUBLIC SCHOOLS OF NORTH CAROLINA

DEPARTMENT OF PUBLIC INSTRUCTION | Catherine Truitt, *Superintendent of Public Instruction*

WWW.DPI.NC.GOV

Title I-A

For Title I-A participation, objective criteria must be used to identify eligible students as described in Section 1115(c) of ESEA. Therefore, implementation of Title I-A services resembles a district's targeted assistance program, as opposed to a schoolwide program. Students who receive Title I-A services are not anonymous and are not necessarily from low-income families. They may be identified during the consultations, but some may also be identified during the upcoming year, based on the criteria discussed during the initial and ongoing consultations. (The identity of students who generate proportionate share funds is private information because it is based on financial criteria, and these students are not necessarily the ones receiving services. [See the Proportionate Share Calculator on the DPI Equitable Services web page.](#))

Title I-A services that may be offered include evaluating and remediating academic need, counseling, mentoring and other benefits as described in Section 1117(a)(1)(A) of ESEA. Furthermore, if the district's Title I-A allotment exceeds \$500,000, at least 1% of the Title I-A equitable services budget must be spent on activities to support parent and family engagement, as described in 1117(a)(1)(B).

Title II-A

During planning for Title II-A equitable services, private schools should be able to identify student needs that would be addressed through improving the quality of teaching or school leadership. The professional development services offered by the district must be based on those needs, and plans should include a way to monitor improvements as a way of evaluating the effectiveness of the services.

The district may agree to reimburse private school staff for registration fees and travel costs, according to the procedure that apply to district staff, or the district may pay the invoices directly to the providers. A district may pay stipends to private school teachers to attend PD events outside of their regularly paid work hours. Any stipends or workshop reimbursements are paid directly to the teachers and not to the private schools. The district must give prior approval for these expenditures, based on event descriptions and an examination of how the event will address needs identified during consultations.

FEDERAL PROGRAM MONITORING AND SUPPORT DIVISION

6307 Mail Service Center, Raleigh, North Carolina 27699-6307 | (984) 236-2786 | Fax (984) 236-2099

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER



PUBLIC SCHOOLS OF NORTH CAROLINA

DEPARTMENT OF PUBLIC INSTRUCTION | Catherine Truitt, *Superintendent of Public Instruction*

WWW.DPI.NC.GOV

A district may invite private school staff to attend any district PD events that address the identified needs. In such cases, the costs of the materials, presenters and venue may be prorated according to the relative numbers of district and private school teachers so that an appropriate amount may be identified as Title II-A equitable service expenditures. Another option would be to provide PD designed for the private school staff through a district employee (paid out of regular salary or a stipend) or through a contractor hired by the district in accordance with district procurement procedures.

Title III-A

A private school's Title III-A needs are determined by the identification of English learners (ELs) and immigrant students. As with Title I-A, students eligible for Title III-A services may be identified during the current academic year, but some may also be identified in the upcoming year during implementation. (The proportionate share is dependent on the numbers of students identified during consultation, as explained in the directions for [the proportionate share calculator](#).)

The district will use PRC 104 funds to serve ELs at private schools participating in Title III-A. Initial identification of these students may be based on the WAPT assessment or the WIDA screener, which is available without additional cost to school districts in North Carolina. The results from these tests can be considered valid for one year, after which students may be re-tested (i.e., annually assessed) with the WIDA screener or the ACCESS assessment. However, the ACCESS assessment is not free of charge and will not yield results until June. Alternatively, if the private school subscribes to a reliable service of its own choosing, the district may agree to recognize those results for initial and/or annual identification of ELs, and the associated assessment costs could be paid from the proportionate share.

PRC 111 will fund equitable services to private school *immigrant students* who are identified by the same [criteria used for public school students](#). This is different from identification of *migrant students* who are served by Title I-C, as described below.

Anyone with questions about identifying or serving English learners and immigrant students may visit the [DPI English Learner web page](#) or contact Marshall.Foster@dpi.nc.gov or Susan.Walz@dpi.nc.gov.

FEDERAL PROGRAM MONITORING AND SUPPORT DIVISION

6307 Mail Service Center, Raleigh, North Carolina 27699-6307 | (984) 236-2786 | Fax (984) 236-2099

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER



PUBLIC SCHOOLS OF NORTH CAROLINA

DEPARTMENT OF PUBLIC INSTRUCTION | Catherine Truitt, *Superintendent of Public Instruction*

WWW.DPI.NC.GOV

Title I-C

Migrant students are identified by trained school district staff or by recruiters from the North Carolina Migrant Education Program. During consultations, district staff or the recruiters should be able to explain the [identification procedures and the types of services](#) available under Title I-C. More details can be found at [the DPI Migrant Education web page](#) or from DPI coordinators Heriberto.Corrall@dpi.nc.gov and Juan.Alvarez@dpi.nc.gov.

Title IV-A

DPI's [Student Support and Academic Enrichment web page](#) provides information about the types of activities that may be funded with Title IV-A. There are three areas in which the funds may be spent:

- A. well-rounded educational opportunities
- B. safe and healthy students and
- C. effective use of technology.

During consultation the private school and the district staff should identify, using measurable terms, specific needs that these funds are intended to address. Most of the activities allowed for district students are allowed for private school students. However, Title IV-A is subject to the same provisions as the other ESEA grants regarding public control of funds. For example, the district may not use federal funds to pay for employees who are working under the supervision of the private school, such as substitute teachers covering for a regular teacher to attend PD or to work on curriculum.

For districts with allotments over \$30,000, the twenty percent minimums for areas A and B and the 15% maximums for area C apply to the entire PRC 108 budget, which includes the proportionate share. In other words, because all funds for equitable services are spent by the district (and none by private schools), the percentages are tallied without regard to which dollars are for equitable services and which are for the district's needs. These requirements may affect the services that are available in both the public and private schools.

Title IV-B

Districts participating in 21st Century Learning Center grants are required to reach out to certain private schools, as described in their approved application for Title IV-B funds. For more

FEDERAL PROGRAM MONITORING AND SUPPORT DIVISION

6307 Mail Service Center, Raleigh, North Carolina 27699-6307 | (984) 236-2786 | Fax (984) 236-2099

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER



PUBLIC SCHOOLS OF NORTH CAROLINA

DEPARTMENT OF PUBLIC INSTRUCTION | Catherine Truitt, *Superintendent of Public Instruction*

WWW.DPI.NC.GOV

information, district staff should visit the [DPI 21st Century Community Learning Center web page](#) and contact the DPI program administrator assigned to their grant.

Evaluating the Effectiveness of Equitable Services

As the agency expending the funds the district must ensure that the needs justifying the plans are routinely monitored for effectiveness and should make any appropriate adjustments. This requirement is specified in item 4 of the [Summary of Topics and Assurances](#) document, and private schools must agree to assist in these efforts when they sign the *Affirmation* form. The process starts with the measurable needs identified during consultation and continues as the district monitors the relevant data throughout the implementation of the program.

For additional information about equitable services under the Elementary and Secondary Education Act, contact Talbot Troy at 984-236-2797 or talbot.troy@dpi.nc.gov.

FEDERAL PROGRAM MONITORING AND SUPPORT DIVISION

6307 Mail Service Center, Raleigh, North Carolina 27699-6307 | (984) 236-2786 | Fax (984) 236-2099

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER