To: Private school officials in North Carolina

From: Talbot Troy, Equitable Services Ombudsman for ESEA Programs
North Carolina Department of Public Instruction

Date: February 24, 2022

Subject: INFORMATION A PRIVATE SCHOOL SHOULD BRING TO THE EQUITABLE SERVICES CONSULTATION MEETING FOR CALCULATING EQUITABLE SHARE AMOUNTS

This memo describes information private school officials will be asked to share with public school districts during the consultations regarding equitable services offered under the Every Student Succeeds Act of 2015 (ESSA).

In deciding whether to accept any such services, private school officials should be prepared to discuss their academic programs and the needs they are experiencing in meeting their goals. In addition, the private school officials will need to provide various student counts, as described below, so the district may determine equitable share amounts. With the proper information at hand, district will be able to design and implement programs that meet the needs of private school students.

To assist in calculating Title I-A equitable share amounts in accordance with ESSA, interested private school officials may need to provide:

- The number of low-income K-12 students and, for each one, their grade level and home address. Pre-kindergarten students are not included in this count. NC DPI recommends that specific student names not be included in the low-income documentation that the private school provides for the district to keep in its files.

- A description of the private school’s proposed method of determining who their low-income students are.

If the private school officials do not have the above information, the district staff can explain how it can be determined. The method used by a private school does not have to be the same as that used for the district schools. However, the district will determine which method is most appropriate in accordance with Section 1117(c)(1) of ESSA.
For calculating Title II and Title IV-A equitable share, a private school’s total K-12 enrollment for the current academic year will be needed. Pre-kindergarten children are not included this count.

For Title III-A, the number of English Learners and the number of immigrant students are two separate counts. Private schools should bring this information to the meetings or be prepared to collect it with assistance from the district. Pre-kindergarten children are not included in these counts.

For Title I-C (Migrant Education Program), the private school staff might not be aware of students who qualify. During the consultation, the school district officials will be able to explain more about how students are identified and served in accordance with the State Service Deliver Plan for the Migrant Education Program.

It is important to remember that during consultations, the districts may not yet know exactly how much the state will be allotting them for each of the grants. Therefore, they will base their equitable share calculations on projections of their total grant amounts. The results will be recalculated when the planning allotments are announced at the start of the application process and again when the actual (i.e., adjusted) allotments are announced in the fall.

Unlike the grant allotments, the student counts described above are not adjusted for the recalculations of equitable share, even though these numbers are likely to be different in the fall. Instead, the same student counts used during the initial consultation period are used. This mirrors the formulations of public school allocations, in that the student numbers for a given year drive the calculations for the subsequent year.

Federal law states that equitable service funds should be obligated during the year for which they are appropriated. Therefore, districts must create reasonable timelines related to expenditures throughout the year, such as regular meetings, invoice due dates and deadlines for submitting periodic time logs. Private schools must be informed of these timelines so they may assist in scheduling the activities the district will implement.

Private schools are encouraged to contact the federal program office of the school district in which they are located to find out more about the consultation meetings, the availability of equitable services and the parameters governing their implementation. During the late winter and early spring, districts are reaching out to private schools for this purpose. Information is also available, and occasionally updated, at the NCDPI web page for equitable services.