

**The ESSA & Private Schools  
Key Things Principals Can Do to Maximize Title Funding**

**Identify what you have.** This past school year you should have been reviewing your current Title programs. If you haven't done so already, determine:

- a) Which services are offered by your district/s.
- b) Which students are receiving Title I and/or Title III? How did you determine "educational need"?
- c) Are these services being administered efficiently?
- d) How your school used its Title II allocation for professional development for teachers and staff. Was the PD effective?
- e) What are the allowable uses for Title I, II, III and IV? Visit the DPI's website and enter the Title program in the search box for more information about allowable uses.
- f) Is the LEA following all provisions of the consultation process? [USDOE guidance on this process can be found here.](#)
- g) Through discussion with your LEA, what's working and what's not working.

**Identify what you need.** Each school year, you should develop and/or implement an ongoing Needs Assessment for your programs. Title I provides direct instructional services for educationally needy private school students. Now under ESSA, Title I services can also include counseling, mentoring, and one-on-one tutoring. Things to consider:

- a) Determine if your students would benefit from these new options.
- b) Talk with the LEA about how services will be implemented in 2018-19.
- c) Provide corresponding data to your LEA for why you need specific services for your students and how you will determine your program's effectiveness.
- d) If you use a vendor for services, determine if they are able to offer these new options.

**Funding Formula.** The formula for Title I has changed, which helps private schools. Some things to consider:

- a) Ask your LEA liaison how the district plans to apportion its Title funds. You can ask for a copy of their district grant application.
- b) Use the "Equitable Share Calculators" on the DPI's website, which will tell you how much money your students and teachers should get, to help you plan for services.
  - i. [Title I-A Calculator](#)
  - ii. [Title II-A Calculator](#)

**Consultation is "timely and meaningful."** School districts are required to collect written affirmation from private school officials that timely and meaningful consultation has occurred. WCRIS worked with the DPI to create the Private School Affirmation Form. As a result, this form better serves private schools. There is a section to check off on receiving timely and meaningful consultation. The goal of consultations is to reach agreement between LEAs and private schools.

**Equitable Services.** School districts must provide eligible private school students with services based on their proportionate share of funds, as requested by private school officials, to best meet the needs of their students.

Things to consider:

- a) Are your students receiving services comparable to what the public school district provides similarly needy students?
- b) Private school Title programs must use a "targeted assistance model" where most public schools operate under a "school-wide assistance model." A targeted assistance model will never look "equal" to a school-wide model on paper.
- c) The ESSA law specifically uses the word equitable and not equal. Equal means exactly the same, whereas equitable means fair.

**Carryover Provisions.** ESSA requires federal funding for private school students, teachers and staff to be spent in the year in which it is allocated. There are carryover options but you are not guaranteed the exact carry over amount you return to your district, since the money goes back into one private school pot and is redistributed the following year based on your school's new enrollment numbers. This is the same procedure followed for public schools. The best practice is to use all of your funding in the year in which it is allocated.

**Determine Poverty.** Low-income students generate Title I funding. Many LEAs use the Federal Free & Reduced Lunch Program as the poverty count for their student population (which means poverty is defined as 185%.) Things to note:

- a) Private schools have five methods they can use in determining the low-income count for their school if they do not participate in the Free & Reduced Lunch program. The chosen measure must be comparable to the district's count.
- b) You can find [these methods on the WCRIS website](#) or [view the DPI's Collecting Poverty Data short](#).
- c) LEAs are charged with determining the poverty count in the private schools residing in their district at least every two years.
- d) It is important to note that the Wisconsin Parental Choice Programs use 220% of poverty for the statewide program and 300% for the Milwaukee and Racine programs. Therefore, having Choice students does not automatically generate funds for Title I.

**Student information for your LEA.** The LEA needs your private school students' names, home addresses, and dates of birth. Additionally, it will need your student poverty data as outlined above. The LEA needs this information in order to accurately determine the equitable share of Title funding for private school students, teachers and staff in the district.

**Document, document, document.** While phone and personal conversations are important, do not rely on "gentleman's agreements" or verbal promises to get services for your students. Always follow-up in writing to build a file on how your students and school are faring. The details for how your Title programs work must be included on your Private School Affirmation Form (PSAF). The LEA must include your signed PSAF in their WISEgrants application.