

Equitable Services Overview

The Elementary and Secondary Education Act (ESEA) was reauthorized in December 2015 as the Every Student Succeeds Act (ESSA), and includes separate provisions governing equitable services for eligible private school students, teachers and other educational personnel, and families. To help ensure equitable services and other benefits for eligible private school children, teachers and other educational personnel, and families, a State Education Agency (SEA) must designate an ombudsman to monitor and enforce ESEA equitable services requirements under both Title I and Title VIII. (ESEA sections 1117(a)(3)(B) and 8501(a)(3)(B).) The following programs must be reported on:

- Title I Part A: Improving Basic Programs Operated by Local Educational Agencies
- Title I, Part C: Education of Migratory Children
- Title II, Part A: Preparing, Training and Recruiting High Quality Teachers, Principals and Other School Leaders
- Title III, Part A: English Language Acquisition, Language Enhancement, and Academic Achievement
- Title IV, Part A: Student Support and Academic Enrichment Grants
- Title IV, Part B: 21st Century Community Learning Centers

The Maryland State Department of Education's (MSDE) Equitable Services State Ombudsman (ESSO) serves as the primary point of contact for addressing questions and concerns from private school officials and local school systems regarding the provision of equitable services. The ombudsman monitors and enforces the equitable services requirements for each program covered under ESEA. Additionally, the MSDE ESSO is required to annually collect the Affirmation of Consultation forms and share the allocation of funds for educational services and other benefits under each ESEA program that a local school system has determined are available for eligible private school children, teachers and other educational personnel, and families. (ESEA sections 1117(a)(4)(C) and 8501(a)(4)(C).)

In order to ensure timely and meaningful consultation has occurred between the local school system and private school officials, local schools will provide the following in the Equitable Services Report:

- Affirmation of Consultation (signed and dated)
- Consultation Timeline for equitable services under applicable ESEA programs
- Complaint Procedure/Dispute Resolution Process for federal programs
- Federal Program Allocations and Equitable Services Proportionate Share for equitable services under applicable ESSA programs.

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Equitable Services Report Cover Page (1 page)

Name of Equitable Services Contact Person: Kelly Powers,

Howard County Public School System

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Phone: 410-313-1270

Email: kelly_powers@hcpss.org

Key Personnel

Title I, Part A Program Director Name: Amy Tieperman	Title: Title I Coordinator
Email: amy_tieperman@hcpss.org	Phone: 410-313-6806
Title I, Part C Program Director Name: N/A	Title: N/A
Email: N/A	Phone: N/A
Title II, Part A Program Director Name: Juliann Dibble	Title: Director, Teacher & Paraprofessional Development
Email: juliann_dibble@hcpss.org	Phone: 410-313-7337
Title III Program Director Name: Tamisha Sampson	Title: ESOL Coordinator K-12
Email: tamisha_sampson@hcpss.org	Phone: 410-313-6669
Title IV, Part A Program Director Name: Caroline Walker	Title: Executive Director, Program Innovation & Student Well-Being
Email: caroline_walker@hcpss.org	Phone: 410-313-7136
Title IV, Part B Program Director Name: Enter text here.	Title: Coordinator, Bridges programs
Email: andrea_sykes@hcpss.org	Phone: 410-313-6600



Michael J. Martirano, EdD, Superintendent, HCPSS

10/27/2022

Date

Attestation for Equitable Services Requested Information

The local education agency must ensure that all documents submitted are consistent with federal program requirements and are included within this Equitable Services Report. By checking the boxes below, you are agreeing to the following attestations:

All documents are included in the Equitable Services Report for Title I Part A, Title I Part C, Title II Part A, Title III, Title IV Part A, and Title IV Part B, including:
Consultation timeline for each program

Signed Affirmation of Consultation Forms
Complaint procedures/dispute resolution process for covered programs under ESEA

The LEA provided the equitable share allocation for each federal program as applicable.

The LEA ensures that private schools are provided with timely and meaningful consultation to participate in equitable services.

The LEA ensures that all participating nonpublic schools are not-for-profit private schools, church- exempt schools, and/or publicly funded schools and verified on [MSDE's Nonpublic Schools Approval Webpage](#).

Kelly Powers
Equitable Services Point of Contact Name

Grant/Project Manager
Title

Kelly Powers
Equitable Services Point of Contact Signature

Oct. 26, 2022
Date

Federal Program Allocations and Equitable Services Proportionate Share

Under sections 1117(a)(4)(C) and 8501(a)(4)(C) of the ESEA, as amended by the ESSA, an SEA is required to annually provide notice of the amount of funds each LEA has determined are available for equitable services under applicable ESEA programs. Please enter each allocation based on the individual federal program for the current fiscal year.

Please complete the Federal Program Allocations and Equitable Services Proportionate Share table for each federal program that your local school system participates in for equitable services, as applicable.

FY23 Allocations	Total Grant Allocation	Total Proportionate Share for Equitable Services
Title I Part A Improving Basic Programs Operated by Local Educational Agencies	\$ 6,250,778	\$ 25,003
Title I Part C Education of Migratory Children	\$ 0	\$ 0
Title II Part A Preparing, Training and Recruiting High Quality Teachers, Principals and Other School Leaders	\$1,027,418.00	\$53,822.00
Title III Part A English Language Acquisition, Language Enhancement, and Academic Achievement	\$ 427,920	\$ 0
Title IV Part A Student Support and Academic Enrichment Grants	\$ 454,630	\$ 17,904
Title IV Part B 21st Century Community Learning Centers	\$ Pending	\$ Pending

Timely and Meaningful Consultation

AFFIRMATION OF CONSULTATION

The Every Student Succeeds Act of 2015 (ESSA) requires that timely and meaningful consultation occur between each public school district receiving ESSA funds and nonpublic (private) school(s) prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs funded under Titles I Part A, I Part C, II Part A, III Part A, IV Part A and IV Part B. The goal of consultation is for district and private school officials to reach agreement on whether and how the district will provide equitable and effective programs for eligible nonpublic school children.

Please submit as an attachment to the Equitable Services Report, the district's Affirmation of Consultation form for each participating nonpublic school, respective to each participating federal program demonstrating whether timely and meaningful consultation occurred or did not occur for covered programs under ESEA. Forms should be signed and dated by the local education agency and participating nonpublic school officials prior to implementation of services.

**NOTE: For the 2023-2024 school year, all local education agencies will be required to use the Maryland State Department of Education's Affirmation of Consultation form which will be available October 2022.*

CONSULTATION TIMELINE

Provide the timeline for timely and meaningful consultation with nonpublic school officials.

TITLE I A:

The following summarizes the process in which the HCPSS Title I office works with surrounding LEA's and private school officials to provide equitable participation to students in private schools.

During **November of the prior school year**, the Howard County Public School System (HCPSS) Office of Grant Services obtains a complete list of all Howard County approved and church exempt private schools from Maryland State Department of Education. The Office of Grant Services makes the initial contact with the private schools by mail and email. At this time, dates for an initial/annual consultation are shared with the private school officials.

The purpose of the initial/annual consultation is to review the Title grants under the Every Student Succeeds Act (ESSA) as well as other competitive grants that pertain to private schools. The private school officials review a timeline and the consultation process. The meeting takes place in December (snow date in January). Information packets are mailed to all private schools.

At the initial/annual consultation, the Title I staff shares the names of participating Title I schools and general information about Title I. Poverty data collection procedures are agreed upon. Thus far, free or reduced meal information has been used. Written affirmation from private school officials takes place during this meeting, confirming that timely meaningful consultation has occurred.

After the initial/annual consultation, the private school officials complete a letter of intent indicating the number of eligible low-income students in Howard County and the surrounding counties and that they are interested in receiving Title I services for the eligible low-performing students. Private schools must submit this information to the Title I Office by the **end of January**.

The Title I Office requests the private schools that have indicated intent to participate, submit the addresses of potentially qualifying students receiving free or reduced meals at their schools. The Operations and Grants Manager for the Archdiocese assists in this process. This information must be received by the Title I Office by the last week of February. Upon receipt of this information, the Title I Office matches the addresses of private school students from low-income families to Title I participating public school attendance areas. The Title I Office sends a verified list to the private school confirming the students eligible for funding.

In **April**, the Title I Office staff meets with the private schools that have eligible low-income students in kindergarten through 5th grade. During this spring consultation meeting, a consultation calendar is established. The following topics are discussed: poverty data, amount of *estimated* instructional funds generated and if funds will be pooled, and the multiple educationally related criteria used to select eligible students. At this time, The Title I Office obtains written affirmation from private school officials or their representatives that timely meaningful consultation has occurred.

In **May**, the Title I Office sends an email to the private school officials requesting names, addresses, and grades of private school students who meet the multiple educationally related criteria. Upon receipt of this information, the Title I Office matches addresses of private school Title I eligible students to participating Title I public school attendance areas. The Title I office sends a verified list of students that will be eligible to receive services during the following school year back to the private school. Academically low performing students must reside in the Title I attendance areas.

In **May**, the Title I Office holds individual student selection meetings about the Title I program for the upcoming year. At that time, Title I services are selected for those students most at-risk from the eligible students. The Title I staff will discuss with private school officials the needs of selected students, Title I services to serve those needs, and location of services. The Title I staff designs services that meet students' needs based on consultation, using the estimated amount of funds generated by the private school students, and the equitable share of funds reserved for district-wide instructional activities.

In **May**, The Howard County Public School System's procedures for private school concerns will be shared with the private school officials. At the close of this meeting, we will obtain written affirmation from private school officials or their representatives that timely meaningful consultation has occurred. (<https://www.hcpss.org/formal-concern/>)

As each Title I tutoring program concludes, private school parents, staff, and tutors are given the opportunity to review student data including formative and summative assessments as well as post assessments. In addition, all stakeholders including the classroom teachers, are given the

opportunity to complete an electronic survey to provide additional feedback around the effectiveness of the program. Student data and survey results will be used to determine the effectiveness of the program for each student.

In **June**, The Title I Office shares with the private school officials: the program design, service delivery model, number of Title I students, allocation, location of services, and estimated costs in a written format. Private school officials are provided the opportunity to comment. If there are changes, the Title I staff will update private school officials in a timely fashion. At this time, we will obtain written affirmation of consultation from private school officials or their representatives that timely meaningful consultation has occurred. (<https://www.hcpss.org/formal-concern/>)

In **August**, prior to the start of the school year, the Title I Office reports on the readiness of the Title I program for private school students to the private school. All teachers hired by the HCPSS to provide Title I services to private school students must meet the State certification and licensure standards in ESSA. Any private school teacher hired to provide Title I services to private school students is under direct supervision of the LEA with respect to all Title I activities.

When a Title I Tutor needs additional materials or equipment, he or she places requests with the Title I Office. The Title I Office will order all materials and equipment if the Title I Coordinator approves that the request is reasonable and necessary. Title I materials and equipment are only for the use of the Title I Tutor with the Title I students. All materials are labeled "Title I" and kept in the possession of the Title I Tutor at all times. Title I funds cannot be paid to any private school. The Title I office also hires teachers so services may begin in September. Consultation will be completed for the upcoming school year prior to Howard County Public School System submitting "Title I Application" as part of the *BTE Master Plan Update*.

In **September**, HCPSS begins Title I services for identified students and provides private school officials with student names, services provided, and names of the Title I teachers. Upon completion of identifying academically eligible students, the private school and the HCPSS Title I Office will inform each family of the Title I services available. This might be through emails, phone calls, and or mailed letters. An educational plan/goal sheet is developed for each student after reviewing student needs. The private school may provide a list of newly-enrolled students who meet the eligibility criteria. The Title I staff consults with private school officials on how new students might be included in the program. Title I, in conjunction with the private school, establishes goals and objectives based on assessments of newly identified students. An educational plan is created for each eligible new student.

The HCPSS's Title I grant does not reserve funds for professional development for HCPSS staff and therefore does not have a professional development allocation for private school staff. Personnel in the Title I Office work with all HCPSS-hired tutors to ensure they have the necessary qualifications and have undergone all required training. In **February**, the private school staff will be invited to the countywide professional development in-service. The Title I Office helps private school staff members select appropriate professional development sessions

based on the needs of the private schools. HCPSS obtains written affirmation from private school officials or their representatives that professional development has occurred.

Throughout the school year, HCPSS Title I schools offer family involvement activities. Private school students and their families will be invited to participate in several of these events. The Title I office reserves funds off the top of its Title I allocation to carry out required Title I family involvement activities. HCPSS determines the amount of funds available for family involvement activities from the reserved funds based on the proportion of private school children from low-income families residing in participating public school attendance areas.

During each semester when services are provided (Fall and Spring), the Title I Office will consult with private school officials and teachers about the progress that Title I private school students are making in their regular classroom. During these consultations, the educational plan created for each student is reviewed and progress documented. At this meeting, the Title I Office and the private school staff determine if services need to continue and/or if goals need to be changed for each participating Title I student based on the data that has been collected and documented. The student goal sheets and achievement data will help determine the overall effectiveness of the Title I program. One time per semester, the Title I Office supervises the provision of Title I services to private school children. The Title I Office documents each visit to review the program.

TITLE I C: N/A

TITLE II A:

Timely, meaningful and open communication assures effective and comprehensive use of Title II-A funds between HCPSS and nonpublic schools on key issues essential to the equitable participation of nonpublic school students, teachers and other educational personnel and with guidance by the Every Student Succeeds (ESSA). Decisions about allocation require fully informed nonpublic schools. Each year, nonprofit nonpublic schools with eligibility designated by MSDE are invited, via multiple methods, to participate in the HCPSS Annual Nonpublic Schools Consultation. At this meeting, all Federal title grant programs and eligibility standards are reviewed. The most recent edition was held on Dec. 8, 2021 by virtual setting. Consultations allow HCPSS program managers to present updates, and evaluate a school's match to a Federal grant. At the conclusion of the meeting, nonpublic schools were given a full enrollment packet for the following school year, 2022/2023. All school representatives were asked to develop a basic needs assessment of their school in relation to professional development, curriculum development, instructional and innovative programs, technology, student safety, etc. Those schools that did not attend the December consultation meeting were mailed the same packet with the same instructions and participation forms.

Affirmation forms and sign-in sheets for nonpublic school consultation meetings are available in hard copy at the Howard County Department of Education Building, 10910 Route 108, Ellicott City, MD 21042. All forms distributed and collected for the FY23 non-public consultation process can be accessed in [this Google folder](#).

The first step in a school's participation is the completion of an "Intent to Participate" form. This form includes a checklist of all Federal programs relevant to a school's own needs assessment in the areas of professional development, curriculum development, instructional and innovative practices, technology, student safety, etc. After Intent Forms are collated for the 2022/2023 school year, HCPSS Federal program managers receive a list of the nonpublic schools interested in one or more programs. Each school receives a direct consult and contact information from one or more of the Federal program managers. HCPSS has procedures established for using ESSA Title grant funds. For Title II-A funds, the process

includes approval of the Professional Development Plan and Budget. After approval, the nonpublic school is provided access to disburse their allocation, per eligible Title II-A guidance, based on student enrollment and equitable per pupil funding. Along with the primary approval of the Title II-A director, the Direct Payment Form is approved by managers in HCPSS Budget and Grants.

In summary, the written process includes:

1. Email, phone and hard copy invitation formats are utilized to all eligible nonpublic schools in Howard County to participate in the annual consultation meeting. The contact list is updated throughout the year to confirm supervisory contacts, and preferred communication formats. Follow up calls to previously participating schools who do not RSVP by the requested deadline. [Annual Invitation](#).
2. The [Annual Consultation Packet](#) is distributed to [meeting attendees](#) which includes an overview of each Title program, Intent to Participate forms, Title II-A Reimbursement Processes & Eligible Spending Guidance, Title II-A Budget Plan Proposal and Example, and Title II-A Direct Payment Form. The [affirmation of consultation form](#) is also completed. Links to relevant aspects of the Consultation:
 1. [Dec. 2021 Annual Consultation Packet](#)
 2. [Dec. 2021 Meeting Attendance Proof](#)
 3. [Dec 2021 Affirmation of Consultation Template](#) AND [completed forms for all attendees](#)
3. Completed [Intent to Participate forms](#) are submitted to the HCPSS Grant Manager for approval. Feedback and consultation is provided to ensure plans are aligned with Title II-A guidance.
 1. [ALL Dec 2021 - date Intent to Participate forms for Title II link](#)
4. Allocation email and letter for Title II-A activities for relevant fiscal year sent to participating nonpublic schools. Using their allocation, nonpublic schools submit a budget plan and proposal to the HCPSS Grant Manager.
5. [Reimbursement and direct payment processing](#) forms are handled through email and postal mail between nonpublic grant managers and the HCPSS Grant Manager throughout the fiscal year. In addition to review by Title II-A Manager, Direct Payment Forms are reviewed by Grant Manager, Director of Purchasing and Accountant III in Budget. [Link to Dec. 2021 reimbursement](#) and [direct payment processing guidance AND forms](#)

Complaint procedures/dispute resolution process for covered programs under ESSA

Access to quality education is predicated on equitable, timely and complete resources.

With guidance to ESSA Sec. 2227(a)(1)(A) and (b); 8501(c): the complaint procedures/dispute resolution process for Title program covered under ESSA includes continuous, timely, and meaningful and open communication between the LEA and the private school officials on key issues that are relevant to the equitable participation of eligible private school students, teachers and other education personnel, and families in ESEA programs. If there are circumstances in which the Howard County Public School System disagrees with the school on views of the consultation process or results, for example, the provision of equitable services through a 3rd party provider, HCPSS will provide notice, an analysis that includes the reasoning to the nonpublic school officials. The reasoning will include information distributed during the Annual Consultation. As with the Annual Consultation, clear and specific guidelines will be provided.

Final decision on the remedy to the disagreement remains with HCPSS. If the nonpublic school does not agree with HCPSS's decision, both entities will seek guidance from the MSDE Ombudsman who monitors and enforces the ESEA equitable services requirements as related to each Title program. The original complaint must receive a response in 45 days. The investigation is resolved within 90 days.

TITLE III A:

Fall 2022: HCPSS ESOL Professional learning schedule is shared with leads at the school as needed so that staff at non-publics may join us for professional learning about Multilingual Learners.

December 2022: Annual Consultation held. Schools return MSDE Affirmation Form, and Intent Form with designation of anticipated participation. Title managers, Nonpublic schools coordinator.

January/February 2023: Follow up with schools indicating their intention to participate. Explain the Title III Screening and identification process.

January-May 2023: Creation of the home language survey is created by the Coordinator, Title III Programs and shared with all schools that indicate the potential participation in the program. Review of data collected to determine if testing is needed. If schools have opted to participate, they will turn in their budget requests.

Continuous: Review that consultations are timely and meaningful. Services, materials delivered electronically based on communication with the non-publics.

June 30, 2023: Budget requests, reviewed, and signed. Conclusion of consults.

TITLE IV A:

October 2022: Staff will receive the MSDE Affirmation of Consultation Form to be used for the upcoming consultation period.

November/December 2022-February 2023: Staff representing the Title I, II, III, and IV Offices meet with representatives for Howard County non-public schools in November/December of each year. They share the purpose of the Title funds and provide interest forms. If a non-public school is interested in participating in Title IV, they send an initial interest form to Kelly Powers, Grant Manager, by the end of February. Kelly forwards these to the Title IV Office, which then individually follows up with each non-public school.

July-October 2023: Once the Title IV allocation is known, Title IV staff share an estimate per pupil amount with the non-public schools and request they confirm interest, state their prior year September 30 K-12 official enrollment, and draft a budget plan. These are shared with the MSDE Title IV Point of Contact and modified by HCPSS and non-public schools as necessary.

November 2023-September 2024: Title IV staff work with non-public schools to purchase approved supplies and services and provide ongoing consultation.

TITLE IV B: Pending

COMPLAINT PROCEDURE/DISPUTE RESOLUTION PROCESS

Provide the local education agency's complaint procedures/dispute resolution process for covered programs under ESSA.

Generally, Access to quality education is predicated on equitable, timely and complete resources. With guidance to ESSA Sec. 2227(a)(1)(A) and (b); 8501(c): the complaint procedures/dispute resolution process for Title program covered under ESSA includes continuous, timely, and meaningful and open communication between the LEA and the private school officials on key issues that are relevant to the

equitable participation of eligible private school students, teachers and other education personnel, and families in ESEA programs. If there are circumstances in which the Howard County Public School System disagrees with the school on views of the consultation process or results, for example, the provision of equitable services through a 3rd party provider, HCPSS will provide notice, an analysis that includes the reasoning to the nonpublic school officials. The reasoning will include information distributed during the Annual Consultation. As with the Annual Consultation, clear and specific guidelines will be provided.

Final decision on the remedy to the disagreement remains with HCPSS. If the nonpublic school does not agree with HCPSS's decision, both entities will seek guidance from the MSDE Ombudsman who monitors and enforces the ESEA equitable services requirements as related to each Title program. The original complaint must receive a response in 45 days. The investigation is resolved within 90 days.

TITLE I A:

Title I Procedures for Private School Concern

1. Private school sends completed Title I Form for Private School Concern to Title I office.
2. Title I staff members schedule a conference with Private School contact within ten business days.
3. At the conference, an action plan is generated and agreed upon by the Private School Contact Person and the Title I staff member. Title I Action Plan for Private School Concern will be generated.
4. A follow-up meeting will be scheduled on a mutually agreed upon date to assess satisfaction.
5. At the follow-up meeting the action plan will be assessed. Title I Follow-up for Private School Concern will be filled out.
6. If an informal concern does not end in a resolution, then a formal complaint can be filed using the HCPSS process found on our public website at <https://www.hcpss.org/formal-concern/>.

Title I Form for Private School Concern

<i>To be completed by a private school official:</i>	
School: _____	Telephone: _____
Contact: _____	Date: _____
Concern: _____ _____	
Requested Action: _____ _____	
_____ Private School Official Signature	

<i>To be completed by a Title I staff member:</i>
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Staff Member: _____ Date Received: _____
Resolution: _____ _____ _____
_____ Title I Coordinator Signature

TITLE I C: N/A

TITLE II A:

Consultations strengthen effectiveness of Title II-A investments when delivered throughout a needs assessment via the Professional Development Plan. Equitable participation is assured through a customized consultation with each nonpublic school. (See attached Professional Development Plan, Example, and Guide to Reimbursements, Direct Payment Form and Example). In addition to Title II-A investments, at the annual consultation meeting, HCPSS includes an option on the “Intent to Participate” form for nonpublic schools to indicate their interest in “competitive grants”. These are grants received by HCPSS that could include participation offers for nonpublics and are kept on file by the HCPSS Grant Manager as grants are awarded in the district.

[Click here](#) for an example of an FY20 budget plan and proposal that is used by non-publics in the HCPSS approval process (and will be used in the FY23 proposal process once funds are affirmed by MSDE). HCPSS uses this document in the consultation process to build awareness for non-publics in delivering strong needs assessments, developing high impact professional development outcomes and implementation plans, and constructing evaluation and monitoring tools that inform decision-making.

TITLE III A:

Any disputes and/or complaints would be directed to Tamisha Sampson, then to the HCPSS ombudsman and finally to the MSDE Non-Public Ombudsman, Barbara Scherr.

TITLE IV A:

Any disputes and/or complaints would be directed to Caroline Walker, Executive Director of Program Innovation and Student Well-Being, then to the HCPSS ombudsman and finally to the MSDE Non-Public Ombudsman, Barbara Scherr.

TITLE IV B:

Any disputes and/or complaints would be directed to Caroline Walker, Executive Director of Program Innovation and Student Well-Being, then to the HCPSS ombudsman and finally to the MSDE Non-Public Ombudsman, Barbara Scherr.