



Requesting Title II, Part A Funding

**A Guide for Christian School
Administrators**

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For additional information regarding Title II, Part A funding requests, please contact your ACSI Regional Office. Visit www.acsi.org for more information.

Introduction

Your Local Educational Agency (LEA) undertakes a significant task in ensuring equitable services to private school teachers in the administration of Title II, Part A funds. As a fiscally responsible agent, there are a number of factors that they must consider to ensure that their actions in disbursing funds are in accordance with federal guidelines.

How you approach your LEA in requesting these funds can make a difference in the success of your request and the ease with which the funds are disbursed. This guide is intended to help private school administrators better understand the process of requesting funds so that you may be prepared as you enter into consultation with your LEA.

Overview of Title II, Part A Funds

Local Educational Agencies (LEAs) receive federal funds under the program Title II, Part A – Teacher and Principal Training and Recruiting Fund – which provides for professional development. This program exists under the Elementary and Secondary Education Act (ESEA) and is required to provide for equitable participation of private school teachers.

The available funds in a district are divided into a “per pupil” amount using the total number of public and private school students served in the district. Private school students are only included in this number if the school which they attend indicates to the LEA (annually) that they wish to participate. Once a “per pupil” total is determined, participating schools may request funding for eligible professional development programs and activities.

Action Steps

ACTION 1 Communicate your intent to participate in Title II, Part A funding to your LEA each year.

The LEA is required to contact officials of all private schools within the district annually to determine if the school faculty intends to participate in Title II, Part A. The LEA must contact each school whether they have participated previously or not.

ACTION 2 Schedule a consultation with your LEA to design and develop a professional development program for your school faculty. This needs to be done in the EARLY SPRING of each year for the coming school year.

Schedule this consultation with your LEA early in the fiscal year (or prior if possible) so that you are able to develop your program in advance of funding and disbursement decisions.

Schools that are most successful in developing professional development programs for Title II, Part A funding are often schools in which the administrator or school officials have invested in developing a healthy, working relationship with their LEA. While you may consult with your LEA by phone, it is recommended that you meet with your LEA face-to-face, at least initially, in an effort to develop a healthy working relationship.

ACTION 3 Prepare for your LEA consultation.

As you prepare to meet with your LEA, it is helpful to know what is required of the LEA as a fiscal agent and the information that the LEA will need to identify through your consultation.

The LEA's responsibilities concern...

...student needs.

Ultimately, the LEA is charged with determining the professional needs of teachers as they relate to improving academic performance of their students. Based on these needs, the LEA must decide the type of professional development that best meets the needs of the teachers and students.

...the non-sectarian nature of the program.

As federal funding, the Title II, Part A funds must be used to provide professional development that is "secular, neutral, nonideological and provides technical information on professional development or teacher quality." The LEA must determine the secular nature of the professional development and may opt to fund only that portion of the program that is secular by percentage or by some other means as determined by the LEA in consultation with school officials.

...accountability.

LEAs are accountable for the funding they disburse. As such, they will seek to justify through documentation that the funding was used appropriately. Your LEA may request documentation such as certificates of completion, descriptions, or other program documents clarifying the program objectives and secular nature.

In consideration of the use of Title II, Part A funds for private school teachers, the LEA is required to hold a consultation with private school officials to discuss the professional development needs of the teachers. Specifically, this consultation includes discussions of the following key issues which are factors affecting the disbursement of funds.

The LEA consultation will seek to identify...

- The needs of private school teachers as they relate to improving the academic performance of their students –this includes how the needs of the teachers and students will be identified;
- what services will be offered;
- how, where, and by whom the services will be provided – this includes discussion of the use of a third-party provider;
- how the services will be assessed and how the results of the assessment will be used to improve those services;
- the size and scope of the equitable services;
- the amount of funds available for those services;
- and how and when the LEA will make decisions about the delivery of services.

Use the [Preparing for Your LEA Consultation](#) (Appendix A) worksheet to help you prepare to address key issues that will be discussed in your consultation. Remember that professional development programs funded by Title II, Part A funds are supplemental and must be in addition to and not in place of normal professional development activities.

ACTION 4 Follow up with your LEA post-consultation and submit your action items/deliverables from the consultation in a timely manner.

Send a follow-up email to your LEA after the consultation expressing appreciation for their time and also summarizing the outcome of the meeting. Be sure to include any action items agreed upon in the meeting and/or clarify next steps.

ACTION 5 Implement your professional development program and submit documentation or other items as required.

During the implementation of your professional development program, it is wise to communicate with your LEA regarding any unforeseen circumstances or changes that impact the program as originally planned. At the conclusion of the program, submit all documentation as required by the LEA.

ACTION 6 Start planning for next year!

As you plan for next year's program, include assessments from the previous year to further improve your program and ultimately, your teachers and students!

Requesting Title II Funds for ACSI events and ConNEXUS Premium

Talking Points

In recent experience with ACSI schools, many LEAs are open and gracious with funding requests from Christian schools and often fund professional development requests for ACSI professional development events and/or ConNEXUS Premium at or close to 100 percent of cost. Some LEAs, however, require more documentation than others or express greater concern with determining the secular nature of the professional development being offered or taken by faculty.

When requesting funding for ACSI professional development events, it is important to present the full package of the event schedule and the ConNEXUS Premium subscription which each faculty member may receive if included in the professional development event's registration price. When applicable, it is important to highlight the fact that the professional development opportunity is not limited to the event sessions but includes over 500 hours of continuing education courses in ConNEXUS Premium.

Initially, you may wish to present your request openly as recommended above and see how your LEA responds. If your LEA expresses concern with the description of particular sessions or with determining which courses from ConNEXUS Premium meet requirements, you may consider some of the strategies identified here to which other LEAs have responded positively.

If your LEA expresses concern over the division of secular vs. sectarian content, you may consider...

- a funding agreement that is based on the percentage of secular content at the event and/or the following data regarding ConNEXUS Premium:

- o 92 percent of the channels in ConNEXUS Premium are non-sectarian/secular
- o Approximately 80 percent of the content in ConNEXUS Premium is non-sectarian/secular
- agreeing upon a minimum of hours or CEUs earned by educators in secular courses/sessions
 - o For example, you may determine that faculty members will show evidence through CEU completion certificates that .5 CEU (3 clock hours) were earned through professional development events/ ConNEXUS Premium during the school year. In this scenario, any additional courses taken by a faculty member would be considered above or beyond the cost of obtaining the .5 CEU which was purchased with the Title II funds.

What If You are Denied Access to Title Benefits?

If Christian school leaders believe that timely and meaningful consultation has not occurred or equitable services have not been provided, they first may want to consider discussing this matter with the LEA official responsible for coordinating the consultation, the LEA superintendent, or the ESEA program director.

In some cases, the LEA has refused to pay for any services (secular OR religious) from a religious provider such as ACSI. The DOE has recently ruled against that kind of religious discrimination. So, a district cannot deny the school payment for services from ACSI simply because they are a religious third-party provider. However, they may choose to pay for only the secular aspects of the services.

The school leader SHOULD NEVER SIGN the agreement with the LEA unless they are totally satisfied with the results of the consultation. If they choose not to sign it, they should then immediately contact the SEA's (State Education Agency) Ombudsman.

Christian school leaders have the right to file a formal written complaint with the SEA, following the SEA's complaint procedures. The Ombudsman will guide the leader through this process. A formal written complaint must include the following:

- a statement that the SEA or LEA has violated a requirement of a federal statute or regulation that applies to a program requiring equitable participation;
- the facts on which the statement is based, and the specific statutory or regulatory requirement allegedly violated;
- and the signature of the complainant.

See 34 CFR §299.12.

ESEA section 8503(a) requires the SEA to resolve a complaint regarding equitable services under Title I, Part A (Title I) or a covered program under Title VIII, Part F (Title VIII) in writing within 45 days. LEAs and private school officials have the right to appeal the SEA's resolution of the complaint to the Department. The appeal to the Department must be filed no later than 30 days following the SEA's resolution of the complaint (or if the SEA fails to resolve the complaint within 45 days). The ESEA then requires the Department to resolve the appeal no later than 90 days after receipt of the appeal. (ESEA section 8503(b)).

The secretary has delegated authority to administer ESEA programs to the assistant secretary for elementary and secondary education. Therefore, appeals of a complaint resolution by the SEA may be sent to the U.S. Department of Education at the following mailing address:

Assistant Secretary for Elementary and Secondary Education
 U.S. Department of Education
 400 Maryland Avenue SW
 Washington, DC 20202

or sent electronically to OESE@ed.gov and ONPE@ed.gov

If you are not certain about how to contact your state Ombudsman, please link to the [Ombudsman Directory](#) or type “Non-public Education Ombudsman Directory” into the Google Search box.

Appendix A — Worksheet: Preparing your LEA Consultation

This worksheet is intended to help you prepare for an LEA consultation by helping private school officials identify key issues that will be discussed during a typical consultation.

Professional Development Planning

Ideally, your Title II, Part A request for funding is a request that stems from a school-wide professional development plan which includes activities, opportunities, and tools providing professional development to teachers.

Professional development activities or programs identified for funding requests should be “based on a review of scientifically based research and must be expected to improve student academic achievement.” Title IX, Section 9101(34) of ESEA, identifies professional development activities as those that:

- Improve and increase teachers’ knowledge of academic subjects and enable teachers to become highly qualified;
- Are an integral part of broad school-wide and district-wide educational improvement plans;
- Give teachers and principals the knowledge and skills to help students meet challenging state academic standards;
- Improve classroom management skills;
- Are sustained, intensive, and classroom-focused and are not one-day or short-term workshops;
- Advance teacher understanding of effective instruction strategies that are based on scientifically based research; and
- Are developed with extensive participation of teachers, principals, parents, and administrators.

Plan Your Program Request

Consider the following objectives that an LEA seeks to address through consultation, and the related questions that will assist you in clarifying your program objectives.

OBJECTIVE 1 The needs of private school teachers as they relate to improving the academic performance of their students – this includes how the needs of the teachers and students will be identified;

What are your students’ academic needs?

What do your faculty need to equip them to help their students improve their academic achievement?

How did you (or will you) assess the needs of your teachers and students?

OBJECTIVE 2 What services will be offered;

What service or activity are you proposing (ideally as part of a larger school-wide professional development plan) to help meet the needs of your faculty? (The implementation of this service/activity should ultimately equip your faculty to meet their students' academic needs.)

OBJECTIVE 3 How, where, and by whom the services will be provided – this includes discussion of the use of a third-party provider;

Who is providing the service or activity? Where and when will this occur?

If you are using a third-party provider, the provider should be identified and your LEA will want to see documentation of the services offered or planned – descriptions are helpful!

If using a faith-based provider, the LEA will need descriptions or other documentation that identify the secular nature of the content.

OBJECTIVE 4 How the services will be assessed and how the results of the assessment will be used to improve those services;

How will you assess the results of the professional development activity or program? (Relate this to teachers AND students...)

How will you use the results of the assessment for further improvement?

You may also wish to consider the documentation that an LEA is required to keep – consider how you can help the LEA by providing certificates of completion, CEU certificates, or other documents to aid them in documenting your faculty's participation.

OBJECTIVE 5 The size and scope of the equitable services;

Clearly identify the service or activity you are proposing; who will participate and for how long will they participate or what is the intended “end” result or state of their participation?

Objectives 6 and 7 are determined by or in consultation with the LEA. Be prepared to consider these as discussion points.

OBJECTIVE 6 The amount of funds available for those services;

The LEA will determine the funding available, however, it is important to consider whether your funding request is reasonable given the amount of funding that will be made available to your school.

OBJECTIVE 7 How and when the LEA will make decisions about the delivery of services.

Before leaving the consultation with the LEA, make sure you understand:

- the next steps in the process;
- how the LEA will make decisions;
- when those decisions may be expected;
- clarify if the LEA needs any additional information from you prior to the decision.

Adapted from: “Title II, Part A – Teacher and Principal Training and Recruiting Fund, Equitable Services to Private School Teachers”, U.S. Department of Education, Office of Non-Public Education.