

## **Nonpublic Work Group Meeting Minutes**

**Meeting started at 10:30am**

**March 6, 2016**

**Those present:** Theresa Villmer, Nicolette Gibson, Al Freeman, Sr. Elizabeth Youngs, Katie Heet, Sandra Cantwell, Parisa Stoddard, Lisa Burks

**Those invited but not in attendance:** Jamie Driver, Karen Hindman, Julie Cowell

### **Background and Introductions**

Theresa Villmer, Ombudsman, welcomed everyone and explained the history of the MoCAPE Nonpublic Work Group. Theresa discussed DESEs desired to model the State Nonpublic Workgroup like the design ESSA outlines for LEAs and that is to have LEAs on the workgroup. Three LEAs were invited and 2 of the 3 were present.

**The group discussed what the purpose of the group should be.** Nicolette shared a historical document, *MoCAPE NONPUBLIC SCHOOL WORK GROUP*, which had been developed a few ago by her predecessor, Ray Wicks. This document had a goal that had been previously developed. The group compared the proposed purpose to the historical goal and the final result was:

Purpose: The Missouri Nonpublic Work Group exists to enhance and facilitate communication and collaboration among nonpublic schools, local education agencies (LEAs) and the Missouri Department of Elementary and Secondary Education (DESE). The group discusses key topics and activities that address issues of mutual interest to Missouri's public and nonpublic schools as well as provides feedback on pertinent guidance addressing the implementation and provision of equitable services in Missouri.

It was decided that the group should continue to work through the *MoCAPE NONPUBLIC SCHOOL WORK GROUP* document in order to make sure it accurately reflects the direction the workgroup wants to go. After a final document is agreed upon, it will be posted on the Nonpublic webpage of DESE's website.

### **As Ombudsman, Theresa shared the activities that have occurred recently out of the office of Federal Programs:**

- attended National Private School Leadership Conference (September 2017)
- attended the National Title I Conference (February 2018)
- presented at the Missouri Federal Programs Conference (September 2017)
- held live webinars which were later posted on DESEs website on: consultation; nonpublic registration and public school verification; and, equitable services.
- updated Nonpublic Consultation Forms
- updated Monitoring Protocols
- updated nonpublic webpage
- updated and expanded the Administrative Manual
- participated in monthly live webinars for State Ombudsman

Julie Cowell wasn't present but Theresa shared in her place on the status of the nonpublic registration and public school verification process.

**Discussion topics touched on by the group:**

- \* Federal Programs List Serve
- \* What it means to be an LEA on Title I bypass and what the process is for coming off bypass
- \* Pair up consultation form(s) with special education (IDEA)
- \* The differences between Title I and Title IIA/IVA when considering who to consult and serve

**Suggestions that came out of the meeting:**

- \* It might help to make a visual of how the money follows the child for Title I and how with Title IIA the money is based on where the NP school resides
- \* Design a preliminary, prior to the consultation meeting, worksheet? Workbook? PowerPoint?
- \* Look into using ZOOM for communication among the workgroup in between actual meetings
- \* Continue to compare the MoCAPE historical work group document to meeting PowerPoint (roles, etc.)
- \* Quick TA documents or fact sheets on hot topics (identify hot topics)
- \* Make 5 min YouTube video on consultation, registration, etc. short, sweet and to the point
- \* Need to do a better job teaching people how to consult instead of just telling them they have to consult
- \* Add a member from DESE – Spec Ed to work group
- \* Nicolette suggested adding another member: a principal in KC who isn't a MoCAPE member

**Attached or linked to these minutes are the following documents that were discussed during the meeting and being provided now for either distribution and/or general knowledge:**

- \* *MoCAPE NONPUBLIC SCHOOL WORK GROUP* historical document
- \* List of districts on bypass
- \* Definition of and how to come off bypass out of the *Administrative Manual* page 32
- \* Link to above mentioned recorded webinars: <https://dese.mo.gov/quality-schools/federal-programs/nonpublic>
- \* Link to above mentioned monitoring protocols: <https://dese.mo.gov/sites/default/files/qs-fc-TM-All-Cycles-ESEA.pdf>
- \* Link to the Administrative Manual: <https://dese.mo.gov/sites/default/files/qs-fc-admin-manual-ESSA-Aug-2017.pdf>
- \* Contact list of current members of the Nonpublic Work Group (will be on website when complete)
- \* Consultation Forms and the Public/Private Design for Education Services <https://dese.mo.gov/quality-schools/federal-programs/nonpublic>

**Future Meetings were discussed and set as:**

May 15<sup>th</sup> 10am to 12:30pm - @ Catholic Pastoral Center in JC  
September 12<sup>th</sup> 10am to 12:30pm - @ Catholic Pastoral Center in JC  
November 14<sup>th</sup> 10am to 12:30pm - @ Jefferson State Office Building in JC



*A State Affiliate of the Council for American Private Education*

## NONPUBLIC SCHOOL WORK GROUP

### Goal –

Establish a nonpublic school work group to facilitate equitable implementation of Federal education program benefits and to address other issues of mutual interest.

### Membership -

Nonpublic school membership should represent the diversity of independent and religious schools in the state and the various regions of the state.

Members should include at least one person from each of the following categories:

- MoCAPE board member
- MoCAPE association central office staff with responsibility for ESEA program services
- MoCAPE association central office staff with responsibility for IDEA program services
- Principal from a school represented by a MoCAPE association member
- Representative from a school not represented by a MoCAPE association member
- Representative from one of the recognized nonpublic school accrediting associations

MoDESE representation should include appropriate staff members in positions to influence policy and effect implementation. These should include MoDESE staff with knowledge and experience related to:

- Components of ESEA and IDEA which concern nonpublic schools
- Both formula and discretionary ESEA programs
- Technical program assistance, including funding formulas
- Certification and professional development requirements and reporting
- Annual nonpublic registration reporting
- Legal interpretations and application of Missouri's "Blaine Amendment" Some MoDESE representatives should be permanent members of the work group, while others should be enlisted to participate as topics requiring their expertise necessitate.

The *Ombudsman* required by *Every Student Succeeds Act* should be a permanent member of the work group.

The work group should consist of three components:

- A general work group of permanent or specified term members;
- Regular sub-committees of the general work group, each with a focus on one of several areas of continuing interest; and,
- Ad hoc sub-committees established to address a specific issue or technical problem within a specified period of time.

MoDESE and the nonpublic school representatives should each appoint a co-chair to serve as the primary point of contact for his or her group's members.

The co-chairs should jointly develop agendas prior to each scheduled meeting.

The MoDESE co-chair would send agendas to the entire group, along with any additional materials which would need to be reviewed prior to the meeting.

### **Meetings -**

The work group should consider the follow meeting scheme.

- The general work group should meet at least quarterly throughout the school year.
- Regular sub-committees should meet in conjunction with the general work group, either prior to or following the general meeting.
- Ad hoc sub-committee should meet as dictated by the needs of specific topics or issues.

General meetings of the work group should be held in Jefferson City or at a mutually agreed upon location in another part of the State. A rotation of meeting locations could be considered to facilitate attendance and participation.

Ad hoc sub-committee meetings could be held by conference call or video conference, although at least one meeting should be conducted in-person.

Each party or associated group should be responsible for travel-related meeting expenses.

### **Topics -**

Initial topics for the work group should include, but not be limited to the following:

- Implementation of *Every Student Succeeds Act*, with particular attention to changes related to nonpublic school program services and benefits;
- Selection of an *Ombudsman* as required by ESSA;
- Review of current MoDESE practices, procedures, and forms related to nonpublic schools for compliance with ESSA requirements; and,
- Professional development for public and nonpublic school officials regarding equitable services under ESSA.

On-going topics for the work group should include, but not be limited to the following:

- District level compliance issues related to ESEA and IDEA implementation for nonpublic schools;
- Anticipated changes in procedures, laws, or funding which have a potential impact on programs, services, or benefits to nonpublic schools;
- State level compliance issues related to nonpublic schools, staff, and students which are identified through USDoe monitoring;
- Issues involving the Title I and any other present or future by-passes;
- Accreditation standards which relate to educator certification and their impact on educator certification of nonpublic school staff;
- Implementation of timely and meaningful consultation for state-wide and discretionary grant applications;
- Allowable uses for program benefits within Missouri's constitutional restrictions;
- Methods to insure that public and nonpublic school leaders, parents, and members of the public receive clear and consistent responses to their inquiries related to ESEA or IDEA nonpublic school services and benefits; and,
- Maintenance and enhancements to the nonpublic school pages of the MoDESE website.

## Missouri Bypass Districts

Co/Dist	School District	Co/Dist	School District
004-106	Community R-VI School District	069-106	Monroe City R-I School District
004-110	Mexico 59 School District	072-074	New Madrid Co R-I School District
010-093	Columbia 93 School District	074-201	Maryville R-II School District
011-082	St. Joseph School District	076-082	Osage Co. R-II School District
012-109	Poplar Bluff R-I School District	079-077	Perry Co. 32 School District
016-090	Jackson R-II School District	080-125	Sedalia 200 School District
016-096	Cape Girardeau 63 School District	083-005	Park Hill School District
024-093	North Kansas City 74 School District	092-088	Francis Howell R-III School District
026-006	Jefferson City School District	092-089	Wentzville R-IV School District
035-093	Campbell R-II School District	092-091	St. Charles Co R-V School District
036-126	Meramec Valley R-III School District	094-078	Farmington R-VII School District
036-131	Union R-XI School District	094-083	No St. Francois Co. R-I School District
036-136	St. Clair R-XIII School District	095-059	Ste. Genevieve Co. R-II School District
037-039	Gasconade Co R-I School District	096-089	Ferguson-Florissant School District
039-141	Springfield R-XII School District	096-092	Kirkwood R-VII School District
042-124	Clinton School District	096-101	Brentwood School District
048-068	Blue Springs R-IV School District	096-103	Hancock Place School District
048-078	Kansas City 33 School District	096-104	Jennings School District
050-006	Festus R-VI School District	096-107	Maplewood-Richmond School District
050-012	Fox C-6 School District	096-109	Normandy School District
050-013	Crystal City 47 School District	096-112	University City School District
050-014	DeSoto 73 School District	096-113	Valley Park School District
059-117	Chillicothe R-II School District	096-114	Webster Groves School District
063-066	Maries Co. R-I School District	097-129	Marshall School District
064-075	Hannibal 60 School District	100-065	Oran R-III School District
067-061	Charleston R-I School District	110-014	Kingston K-14 School District
068-070	Moniteau Co. R-I School District	115-115	St. Louis City School District

### Title I.A Nonpublic Bypass Provision

Bypass is a means by which the U.S ED Secretary directly provides equitable services to nonpublic school students and teachers through a third-party provider, if the LEA or DESE has substantially failed or is unwilling to provide, or is prohibited by law from providing, equitable services for nonpublic school students.

The allocation for nonpublic services provided through the bypass provision is taken directly from the LEA's original allocation. The bypass amount is found as an Allocation Adjustment on the Current Funds Available page in the ESEA Consolidated Application. LEAs on bypass are prohibited by law from providing for the participation in Title I.A services; nonpublic consultation and services are provided by the third party contract through U.S ED.

A list of LEAs on bypass is available on the [Federal Programs website](#). An LEA designated as bypass can be found on Step 3 and 4 of the BOA in the ESEA Consolidated Application.

The LEA and the nonpublic school(s) with children residing in the LEA boundaries may request to be removed from bypass. All representatives must write and sign off on a plan which documents the public school will provide Title I.A services on an equitable basis. This plan and a request to be removed from bypass should be sent to the [Director of Federal Programs](#) at DESE. The request and plan will be reviewed to determine whether it meets the requirements of the law. Once accepted by DESE, the request and plan will be forwarded for approval to U.S. ED Secretary.