

Nonpublic Advisory Committee Meeting

December 10, 2019

Advisory Committee Attendees - Kim Hermsen (Archdiocese of Dubuque), Brian L'Heureux (Valley Lutheran School), Lee Morrison (Davenport Diocese)

Attendees: Nicole Proesch, Shan Sievert, Eric St. Clair, Joan Thompson - Iowa Catholic Conference, Steve Crew, Donna Bishop- DSM Diocese, Patty Lansing- Sioux City Diocese, Isbelia Arzola, Amy Williamson, Geri McMahon, Pam McDonnell, Holly Barnes, Dave Tilly

Meeting is also being recorded via Zoom.

1. Welcome (Kim Hermsen/Dave Tilly)
 - a. Review Agenda - no changes
 - b. Committee Openings
 - i. Two vacancies.
 - ii. Shan will reach out to the Governor's Office/Boards and Commissions.
 - iii. Kim understands there have been applications completed; Shan will follow-up with the governor's office.
2. Concurrent Enrollment (Eric St. Clair)
 - a. New Law - Accredited Nonpublics can work with community colleges for concurrent enrollment.
 - i. Rules have been adopted by the State Board; possibly in front of ARRC on January 10.
 - ii. Kim would like a letter to the field to help explain these rules to the nonpublic high schools; it might be good to send to public schools, as well; also, in SLU potentially for February edition and superintendent's notes. Eric and Nicole will draft content.
 - iii. Fall data collection and spring data collection as stated in law. Funds once a year - \$1 million appropriation. Final count in the spring. This will be how the funds will be calculated to schools. Amounts will have to be prorated if more students enrolled.
 - iv. Put in the superintendent's notes.
3. Iowa State Assessment of Student Progress (ISASP) Update (Dave Tilly)
 - a. During the last meeting Dave shared with the group that schools accredited through the state accreditation process will be giving the ISASP. Accredited nonpublics are generally moving in that direction (ISASP) and everyone will be moved to the ISASP for next year (2020-2021). The recommendation to take an additional year for all nonpublics to move to ISASP was taken back to cabinet at the Department and accepted between last meeting and this meeting. For this

year, that means nonpublics can give the old form of the ISASP if they need an additional year to transition.

- b. A letter on assessment will be going out to public schools and will be copied to nonpublics, as well. Expect this in the next couple of months.
 - c. The state board adopted the new ISASP performance standards since the last nonpublic advisory meeting. How is that going for people who used it?
 - i. Lee reported no problems, schools were very satisfied.
 - ii. Council Bluffs reported results better than expected given a new assessment.
 - iii. Kim's school's all gave the ISASP and reports that it went as well as could be expected. Overall generally pleased with the scores. Biggest hiccup (still working with Pearson on this) is that Kim does not get any results for the schools - only the schools get the scores. There is a way Pearson can get the scores for dioceses but requires a special set up with Pearson.
 - iv. Question: Read that there are not percentile ranks available this year. How will that work this and next year? We will need to check back with the superintendents' advisory council and the assessment committee to find out what was said. In the process of getting the student reporting - hope to have that out in January.
 - v. By 2024 fully adaptive test.
4. Title Funding Updates
- a. Consolidated Application (Steve Crew)
 - i. The 2019-2020 is the first year we have had the nonpublic consultation agreement in the consolidated application. We had some instances where nonpublic schools reported they were not adequately consulted in spite of public school certification of agreements and amounts. The Department surveyed nonpublics and asked publics and nonpublics to make the necessary corrections based on nonpublic survey responses. Corrected allocations have been done for Title programs and been re-posted to the web page as of this morning.
 - ii. The major issue we encountered when asking nonpublics for information was whether they were, in fact, participating in each Title program.
 - iii. Question: can nonpublic funds be carried-over? Title II, III, IV carryover up to 10%. Title I carry-over up to 15%. You can carry-over funds up to one year. FY18 funds will revert if not spent.
 - iv. Need to focus on the services that are needed - not just the dollar amounts available.
 - v. How can we work on the strategic plan as a whole and plan for spending? Can you spend before you get the money and plan to get reimbursed?
 - vi. You can use spring data to start services in the fall.
 - vii. Title II funds can be transferred into Title I for services that are needed.
 - viii. LEAs know allocation amounts prior to school starting.
 - b. Title I Funding Amounts (Geri McMahon)

- i. These funds have been posted on the ESSA website.
 - c. Webinar - Consultation for all Title Programs (Isbelia Arzola/Steve Crew) - February 2020
 - i. At what point do we start offering services after the consultation has been completed?
 - ii. Does Steve advocate on the behalf of the nonpublic to the LEA? Does he represent the nonpublic school? Program leads should be contacted first. Steve is only invited to the meeting if there is a complaint filed. Program leads meet once a week with Amy and discuss issues that have been presented to the program lead.
 - iii. Everyone should view the webinar. Please strongly suggest that everyone at the nonpublic level view the webinar.
 - iv. Publication of the webinar will be in the SLU, SBO newsletter, nonpublic administrators.
 - v. Amy offered a public webinar for a question/answer - generally on a Friday during budget times and consultation time.
 - vi. Suggested that it be a recorded webinar only - not a live webinar. Attach slides. Everyone can view on their own.
 - d. Title IA Non-Regulatory Guidance (Geri McMahon/Steve Crew)
 - i. Posted by the federal government in October 2019.
 - ii. Question: What do you think are the big "a-has" or take away?
 - iii. Steve Crew attends the ombudsman meeting each year. Ombudspersons from all states felt the guidance violated equitable share, but the federal agency disregarded their comments. This is non-regulatory guidance, so we always consult the code first, then go to any guidance for clarification. LEA can transfer Title funds to a fund that does not have equitable share. This would be difficult under Iowa's approved ESSA Plan. The Department operationalizes what the law states not what non-regulatory guidance says. Feds can give guidance, states can disagree as long as you are following the law and regulations.
 - iv. There are a couple of items in the non-regulatory guidance the DE does not support as rooted in code: one is transferability, one is limits to nonpublic carry-over.
 - v. In the consolidated application - it states the actual code citation.
 - e. Title IIA Conference Attendance (Isbelia Arzola)
 - i. You cannot use Title II money to attend a conference just because you want to - it would need to be aligned with your needs assessment and be part of your overall plan.
 - ii. Professional development requirements for federal program dollars apply to public and nonpublic schools. "Providers must be independent of the organization and any religious organization" according to the statute, but that was determined unconstitutional according to the supreme court. The rest of the requirements apply.
 - 1. Has to meet the definition of professional development.

2. Is an allowable activity.
 3. Based on student data and priorities of the school.
 4. Must be secular, nonideological.
 5. Must be for teachers, not board members, etc. (this is in guidance we can send).
- iii. Suggest that at nonpublic consultation you do not discuss specific workshops if you do not know the agendas/topics, but needs.
 - iv. In the webinar in February, address professional development and conference attendance.
- f. Administrative Costs (Steve Crew)
 - i. Heard at an out-of-state conference that there have been significant reductions in the amount of administrative costs that can be taken off the top.
 - ii. Each Title program is different re: the amount of administrative funds that can be set aside at the LEA level. If it is not listed specifically in the code you have to look in EDGAR for the administrative amount allowed.
 1. Title I is taken as a set-aside; the amount is not limited (see EDGAR - the criteria are "reasonable and necessary") and it is taken after the equitable share is determined.
 2. Title II is calculated before the equitable share and is determined via EDGAR.
 3. Title III is not more than 2% and can be done before or after equitable share.
 4. Nonpublic can ask what administrative costs the LEA is taking for each of the Title programs.
5. Other Topics (Kim Hermsen/Dave Tilly)
 - a. Legislative Update from Shan
 - i. Majority of Department proposals for this year is technical corrections.
 - ii. Community Colleges state accreditation standards for Career and Technical Education.
 - iii. Senior Year Plus criteria changes due to ISASP changes - removal of state proficiency requirements.
 - iv. Ryan and Shan meeting with education chairs Monday.
 - b. Chapter 103 rules were noticed at the last state board meeting - these apply to nonpublics. Public hearing will be held on January 7 at the Department of Education, State Board Room from 11:00 a.m. to noon.
 - c. Topics for Next Meeting
 - i. Legislative Update (Shan).
 - ii. If you have any more agenda items please let Kim or Dave know.