

ZACH HAWKINS
OPI TITLE I & FEDERAL
PROGRAMS DIRECTOR;
PRIVATE SCHOOL
OMBUDSMAN
MARCH 11, 2026

PRIVATE SCHOOL PARTICIPATION IN FEDERAL TITLE PROGRAMS



MY BACKGROUND



- Grew up near Troy, MT
- Started my professional career teaching in Hays, MT 2000
- Taught in Heart Butte, MT 2001-2004
- Worked in federal college access programs for 12 years
- OPI IEFA Director Dec. 2018-March 2024
- Took over this role in March 2024





PRIVATE SCHOOL OMBUDSMAN

- The Ombudsman is a requirement under the Every Student Succeeds Act (ESSA)
- Role is to work with LEAs and Non-public schools to make sure that high-quality services are provided to eligible students
- Assists private schools if they are not being treated fairly



AGENDA

Private School Participation ESEA/ESSA

Title Programs

School and Student Eligibility and Equitable Share

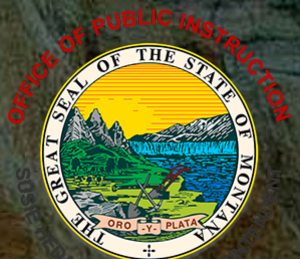
Basics of Public/Private School Partnerships

Annual Timeline

Consultation and Planning

Website/Forms

Q and A



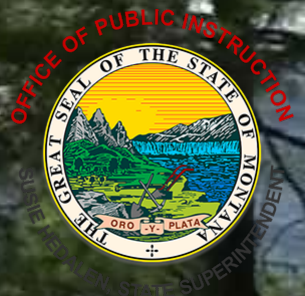
ESEA/ESSA SECTION 1117

- Under Title I, LEA's must provide services to eligible non-public students if requested
- In Montana, homeschools are considered private schools
- Services must be to eligible elementary and secondary students, their teachers, and their families
- Equitable share is a per student calculation of Title allocation based upon the eligible number of non-public students residing in the LEAs boundaries but attending a non-public school
- Services must be equitable to those provided to eligible public-school children, teachers, and families
- Services must be secular, neutral, and nonideological



WHAT IS TITLE I?

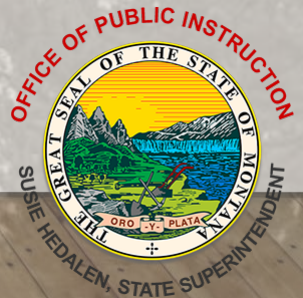
- Title I is the largest, federally funded educational program developed under the Elementary and Secondary Education Act of 1965
- Present law is called Every Student Succeeds Act-ESSA
- Established to give supplemental educational services to at-risk students for them to catch up to their peers
- All services must be in addition to regular classroom instruction
- All services, materials, professional development, etc. must be in addition to, not in replacement of the regular educational program both in program and fiscal components. “Supplement not supplant”



TITLE II

Supporting Effective Instruction

- Based upon a school needs assessment and teacher growth plans
- Private school staff may also participate in Title II, Part A
- Private school equitable share funds may only be used for professional development activities.
- Private school is required to complete a needs assessment for school PD needs, and it should also look at teacher professional growth plans.
- District may invite private school staff to its own PD activities, and a portion of those costs may come out of the equitable share set aside.
- Private schools may use a portion of the equitable share funds to attend PD like the National Catholic Schools conference.
- District may not reimburse the private school but may directly pay staff members.



TITLE III

- Title III assists ELs, including immigrant children and youth, to develop English proficiency and to meet the same challenging state academic standards that other children are expected to meet.
- Schools must use Title III funds to implement language instruction educational programs that are keyed to the overall standards. SEAs, districts, and schools must report the English proficiency and core academic content knowledge of ELs.
- Title III has a dual purpose: to help ELs meet the same state academic achievement standards applicable to all students, and that they develop proficiency in the English language. These goals are closely related but distinct.



TITLE IV-A

- Title IV Part A is also known as **Student Support and Academic Enrichment (SSAE)**. The SSAE program is intended to improve students' academic achievement by increasing the capacity to provide all students with:
 - **Access to a well-rounded education**
 - **Improve school conditions for student learning, safe and healthy students**
 - **Improve the use of technology to improve the academic achievement and digital literacy of all students**



HOW DO SCHOOLS AND STUDENTS PARTICIPATE IN TITLE PROGRAMS?

- Students must reside in a participating public school attendance area
- Student's non-public school must be registered with their County Superintendent of Schools and indicate interest in receiving federal program services
- Must meet Title program eligibility the requirements to be served
 - Private school students must be low income or attend a school with some low-income students generate a Title I A allocation
 - Home school students must be low income to generate a Title I A allocation
 - Any non-public student must show academic deficiency & have a plan of improvement which Title I A supports could augment
 - Title II and Title IV equitable share based upon non-public enrollment. No low-income qualifier
 - Title III equitable share based upon number of identified ELL students
- LEA must work with private school to determine eligibility

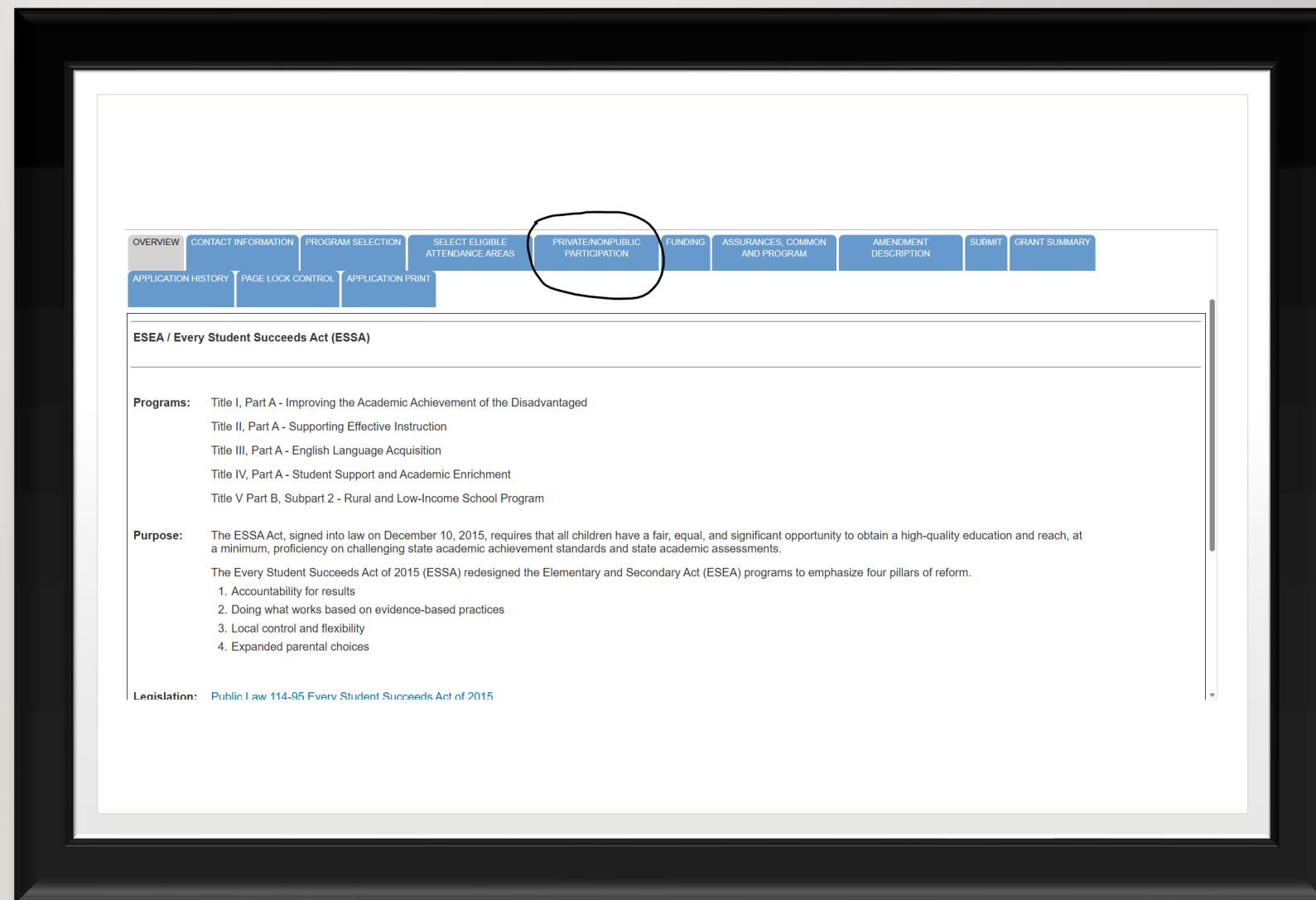


E-GRANTS TARGETING STEP I

Attendance Center	Select Category	Grade Span	Feeder Pattern Used	CEP	Grandfather	Homeless Enrollment	Public Enrollment	*Public # Low Income	Direct Cert Enrollment	Direct Cert Number	Non-Public Enrollment	Non-Public # Low Income
0141 - Lewis & Clark School	Elementary	PK-6	☐	☐	☐	11	326	195	0	0	1	0
0142 - Lincoln School	Elementary	PK-6	☐	☐	☐	14	384	218	0	0	4	0
0143 - Longfellow School	Elementary	PK-6	☐	☒	☐	43	316	312	316	290	2	2
0146 - Meadow Lark School	Elementary	PK-6	☐	☐	☐	2	531	94	0	0	9	0
0147 - Morningside School	Elementary	PK-6	☐	☐	☐	9	204	130	0	0	0	0
0148 - Riverview School	Elementary	PK-6	☐	☐	☐	7	449	183	0	0	3	0
0151 - Sunnyside School	Elementary	PK-6	☐	☒	☐	24	406	337	406	223	3	2



E-GRANTS PRIVATE/NONPUBLIC PARTICIPATION TAB



PRIVATE/NONPUBLIC PARTICIPATION CONT.....

This application has been approved. You must create an amendment in order to make updates.

OVERVIEW	CONTACT INFORMATION	PROGRAM SELECTION	SELECT ELIGIBLE ATTENDANCE AREAS	PRIVATE/NONPUBLIC PARTICIPATION	FUNDING	ASSURANCES, COMMON AND PROGRAM	AMENDMENT DESCRIPTION	SUBMIT	GRANT SUMMARY
APPLICATION HISTORY	PAGE LOCK CONTROL	APPLICATION PRINT							
PARTICIPATING PRIVATE/NONPUBLIC SCHOOL	TITLE I-A EQUITABLE SHARE	TITLE II-A EQUITABLE SHARE	TITLE III-A EQUITABLE SHARE	TITLE IV-A EQUITABLE SHARE					

ESEA/ESSA - Participating Private/Nonpublic Schools

[Click for Instructions](#)

General Information

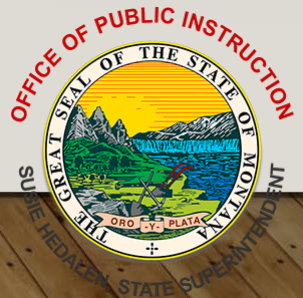
Participating Private/Nonpublic Schools

**** Private/Nonpublic School funds MUST be spent in the year in which they are allocated. ****

Enter the number of participating Private/Nonpublic schools.

* You cannot save amounts on this page until you have calculated the equitable share amount for that program (line A), which is done on the Title I-A Targeting Step 4 page and on the Title IIA and Title IIIA Equitable Share pages following this page.

* No amounts can be entered in the list if you have 0 (zero) participating schools.



PRIVATE/NONPUBLIC PARTICIPATION CONT....



**** Private/Nonpublic School funds MUST be spent in the year in which they are allocated. ****

Enter the number of participating Private/Nonpublic schools.

* You cannot save amounts on this page until you have calculated the equitable share amount for that program (line A), which is done on the Title I-A Targeting Step 4 page and on the Title IIA and Title IIIA Equitable Share pages following this page.

* No amounts can be entered in the list if you have 0 (zero) participating schools.

How many participating Private/Nonpublic schools are attended by students who reside within your boundaries?

0

Private/Nonpublic School Equitable Share

Enter the names of the participating Private/Nonpublic schools along with their share of the program funds. The Program Totals (B) from these school participation pages must equal the program's equitable share amounts (A) when the application is submitted to the OPI.

	Equitable Share by Title			
	Title I-A	Title II-A	Title III-A	Title IV-A
(A) Equitable share amounts from the previous Title Program Private/NonPublic pages	0	0	0	0
Private/Nonpublic School				
(B) Program Totals	0	0	0	0

TITLE II A EQUITABLE SHARE

PARTICIPATING PRIVATE/NONPUBLIC SCHOOL	TITLE I-A EQUITABLE SHARE	TITLE II-A EQUITABLE SHARE	TITLE III-A EQUITABLE SHARE	TITLE IV-A EQUITABLE SHARE
Private/Nonpublic Schools Share				
Click for Instructions				
** Private/Nonpublic School funds MUST be spent in the year in which they are allocated. **				
REMINDER: IF YOU TRANSFERRED FUNDS ON THE FUNDING TAB, YOU MUST RETURN TO THE PRIVATE/NONPUBLIC PARTICIPATION - TITLE II, III, AND IV EQUITABLE SHARE TABS AND CLICK CALCULATE AND SAVE.				
The amounts at the beginning of each line are the values used in, and the results of, the calculations the last time this page was saved. The amounts displayed in the second boxes on lines 1 through 3 are the current values for each of these variables and are the values that will be used in the calculations the next time the page is saved. The two amounts on each of these three lines must be equal in order to pass the consistency check. This will ensure that the page truly reflects the effects of any changes made in program or budget.				
1.	0	Amount available for public and private/nonpublic schools used in last save of this page. Current Amount available:		0
2.	0	Budgeted Indirect Cost amount (from the Budget Detail page). Current Indirect Cost on the Budget Detail page:		0
3.	0	Remaining funds (Line 1 - Line 2 calculated only on Save). Amount calculated with lines 1 and 2 current amounts:		0
4a.	0	Enter the number of participating elementary private/nonpublic students. (District must enter enrollment). (Click to see Private/Nonpublic Participation List - no enrollment data)		
4b.	0	Enter the number of participating high school private/nonpublic students. (District must enter enrollment).		
5.	367	Public District Enrollment (Sum of Fiscal Agent and all member LE counts if System or Consortium)		
6.	0	Sum of Public District and Private/Nonpublic Enrollments (Line 4a + Line 4b + Line 5 calculated only on Save)		
7.	0.000000	Proportion of Participating Private/Nonpublic School Enrollment Compared to Total Enrollment ((Line 4a + Line 4b) / Line 6 calculated only on Save)		



Title III-A Private/Nonpublic Schools Share

[Click for Instructions](#)

**** Private/Nonpublic School funds MUST be spent in the year in which they are allocated. ****

Reminder: If you transferred funds on the funding tab, you must return to the Private/NonPublic Participation - Title II, III, and IV Equitable share tabs and click calculate and save.

Click the "Calculate and Save Equitable Share" button below. This will automatically calculate the Private/Nonpublic school share (Line 8), based on the number of English Learners (EL) enrolled in both Private/Nonpublic schools (Line 4) and Public (Line 5). This step must be completed in order to pass the consistency check and submit the application.

Districts are required to re-calculate the equitable share every time there is a change to the allocation amount (i.e. reallocated or transferred funds) or if there is a change to the Private/Nonpublic EL student participation.

- | | | | |
|----|--------------------------------|--|--------------------------------|
| 1. | <input type="text" value="0"/> | Amount available for public and private/nonpublic schools used in last save of this page. Current Amount available: | <input type="text" value="0"/> |
| 2. | <input type="text" value="0"/> | Budgeted Indirect Cost amount (from the Budget Detail page). Current Indirect Cost on the Budget Detail page: | <input type="text" value="0"/> |
| 3. | <input type="text" value="0"/> | Remaining funds (Line 1 - Line 2 calculated only on Save). Amount calculated with lines 1 and 2 current amounts: | <input type="text" value="0"/> |
| 4. | <input type="text" value="0"/> | EL Enrollment for Participating Private/Nonpublic Schools from Private/Nonpublic Participation List (Click to see Private/Nonpublic Participation List - no enrollment data) | |
| 5. | <input type="text" value="0"/> | Public District EL Enrollment (Sum of Fiscal Agent and all member LE counts if System or Consortium) | |
| 6. | <input type="text" value="0"/> | Sum of Public District and Private/Nonpublic Enrollments (Line 4 + Line 5 calculated only on Save) | |

TITLE III EQUITABLE SHARE



TITLE IV A EQUITABLE SHARE

Title IV-A Private/Nonpublic Schools Share

[Click for Instructions](#)

**** Private/Nonpublic School funds MUST be spent in the year in which they are allocated. ****

Reminder: If you transferred funds on the funding tab, you must return to the Private/NonPublic Participation - Title II, III, and IV Equitable share tabs and click calculate and save.

Enter the number of participating Private/Nonpublic students on line 4. Click the 'Calculate and Save Equitable Share' button below. This will automatically calculate the Private/Nonpublic school share (Line 8). This step must be completed in order to pass the consistency check and submit the application.

Districts are required to re-calculate the equitable share any time there is a change to the allocation amount (i.e. reallocated or transferred funds) or if there is a change in the number of Private/Nonpublic students participating in the program.

1. Amount available for public and private/nonpublic schools used in last save of this page. Current Amount available:
2. Budgeted Indirect Cost amount (from the Budget Detail page). Current Indirect Cost on the Budget Detail page:
3. Remaining funds (Line 1 - Line 2 calculated only on Save). Amount calculated with lines 1 and 2 current amounts:
4. Enter Enrollment for Participating Private/Nonpublic Schools (include all member LE counts if System or Consortium)(Click to see Private/Nonpublic Participation List - no enrollment data)
5. Public District Enrollment (Sum of Fiscal Agent and all member LE counts if System or Consortium)
6. Sum of Public District and Private/Nonpublic Enrollments (Line 4 + Line 5 calculated only on Save)
7. Proportion of Participating Private/Nonpublic School Enrollment Compared to Total Enrollment (Line 4 / Line 6 calculated only on Save)



ANNUAL TIMELINE

October-February: County Superintendents Update OPI Non-Public Schools Database



March-April: LEAs Send Notifications to Non-Public Schools Listed in OPI Database



May-July: Consultation Period.
Affirmation of Consultation and Interlocal Agreements
Due July 31st



October: Private & Homeschools Report Student Numbers to County Supt. for OPI Non-Public Database



E-MAIL WITH LETTER TO THE AR FROM TITLE I DIRECTOR

|

To Whom It May Concern:

Enclosed is a copy of the 2026-2027 Opportunity to Participate in Federally Funded Programs by Nonpublic Schools notification. Each year we send this form to the private/nonpublic schools whom have attending students from within of our public school district as required by the Elementary and Secondary Education Act (ESEA).

Also included is an informational document regarding federal programs of interest. However, if you would like further information regarding the programs your LEA participates in, please contact **(District Contact) (Title) (Contact Info)**

If you have eligible students and are interested in having them receive supplemental Federal Program services, check box #2 towards the bottom of the page indicating your wish to participate. On the following page, please check the programs you would like to participate in; return both to **(District Contact and address)** Please note that your students can only participate in those programs for which our district receives funding.

If you are not interested in participating, we still request your signature to show you have been given the opportunity to participate for the 2026-2027 school year. Please check box #1 toward the bottom of the page indicating you do not wish to participate.

Please return this signed form by **(Date at least 2-3 weeks after date of letter)** You should be aware that if the form is not returned by this date, you will not be eligible for equitable share and Federal Programs services in the 2026-27 school year.

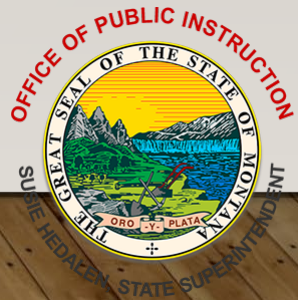
Please contact **(district contact)** should you have any questions about this letter or the implications thereof.

Sincerely,

(Signature)

(Name and Title)

Enclosures:



LOGIN WITH ACCOUNT



Montana
Office of Public Instruction
Susie Hedalen, Superintendent

OPI Secure Portal

Sign Out

Your password is about to expire! Your password will expire in 10 days. Do you want [change your password](#) now?

You can see the list of integrated applications [here](#). After checking the list, if you don't see the icon in your portal below, and you think you should see it, please contact the [OPI HelpDesk](#) (406) 444-0087 to get the app added to your portal.



Financial Reporting
(MAEFAIRS)



Non-Public Schools



OPI Calendar



OPI Reporting Center



Perceptive



Teach Montana



Travel

USERNAME/PASSWORD



Reset your password the first time you log in



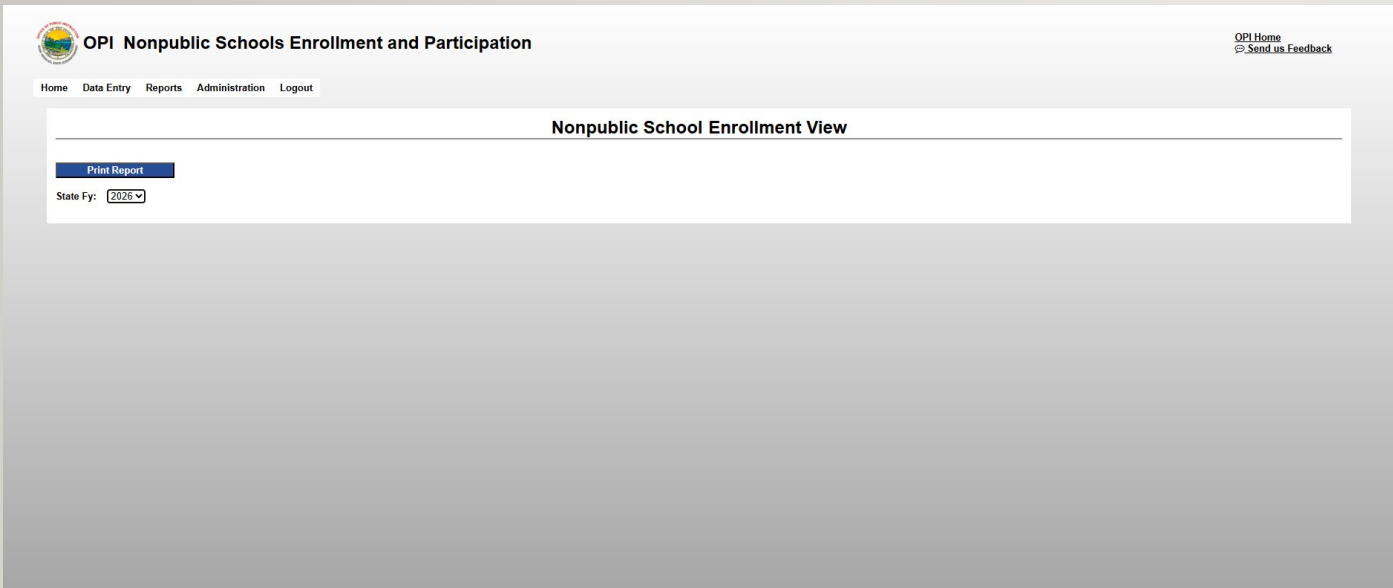
Anytime you forget/expire



Passwords expire after 60 days



REPORTS TO REVIEW



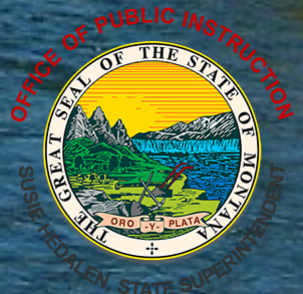
The screenshot shows a web application interface for the Office of Public Instruction (OPI) in Montana. The header includes the OPI logo and the title "OPI Nonpublic Schools Enrollment and Participation". A navigation bar contains links for Home, Data Entry, Reports, Administration, and Logout. The main content area is titled "Nonpublic School Enrollment View". Below this title, there is a "Print Report" button and a "State Fy:" dropdown menu currently set to "2026".

- Enrollment Spreadsheet
Provides Non-Public Names and Addresses
- Non-Public Schools District View Provides List of Non-Publics That Requested Federal Programs Info.
- Contact Marla Swanby With Any Questions:
Mswanby@mt.gov 406-438-2160



BASICS OF STRONG PUBLIC/PRIVATE PARTNERSHIPS

- Common Understanding and Communication
- Effective Consultation Process
- Services Tied To Non-Public School/Student Needs And Plans
- Commitment to Doing What's Best For Students



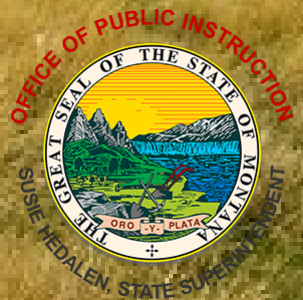
CONSULTATION

- Discussions must be held between the LEA and private schools on the key issues related to Title I services
- This gives both groups an opportunity to express their views about the services
- Helps to foster productive working relationships between the groups to better impact student achievement



CONSULTATION REQUIREMENTS

- Number of students in non-public school
- Ways the LEA will/has identify(ied) eligible students
- Number of eligible students
- Services to be provided
- How and when the LEA will make decisions about the delivery of services
- How, where, and by whom the LEA will provide services
- The method and sources of data the LEA will use to identify eligible students



MORE REQUIREMENTS

- Services the LEA will provide to teachers and families of eligible students
- Discussion of the delivery mechanisms the LEA will use to provide services
- Third-party contractor should use
 - MOU
 - LOA
 - Other Contract



GENERAL CONSULTATION INFORMATION

- LEA must keep records related to the consultations-
Montana Open Meetings Law
- Signed affirmations from private school
- Consultation should be on-going
- Private schools have the right to complain
- Title I application (Egrants) must be available to the
private school



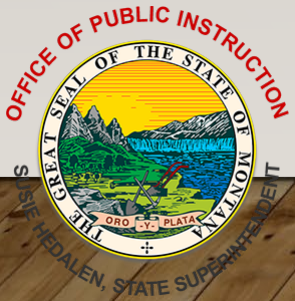
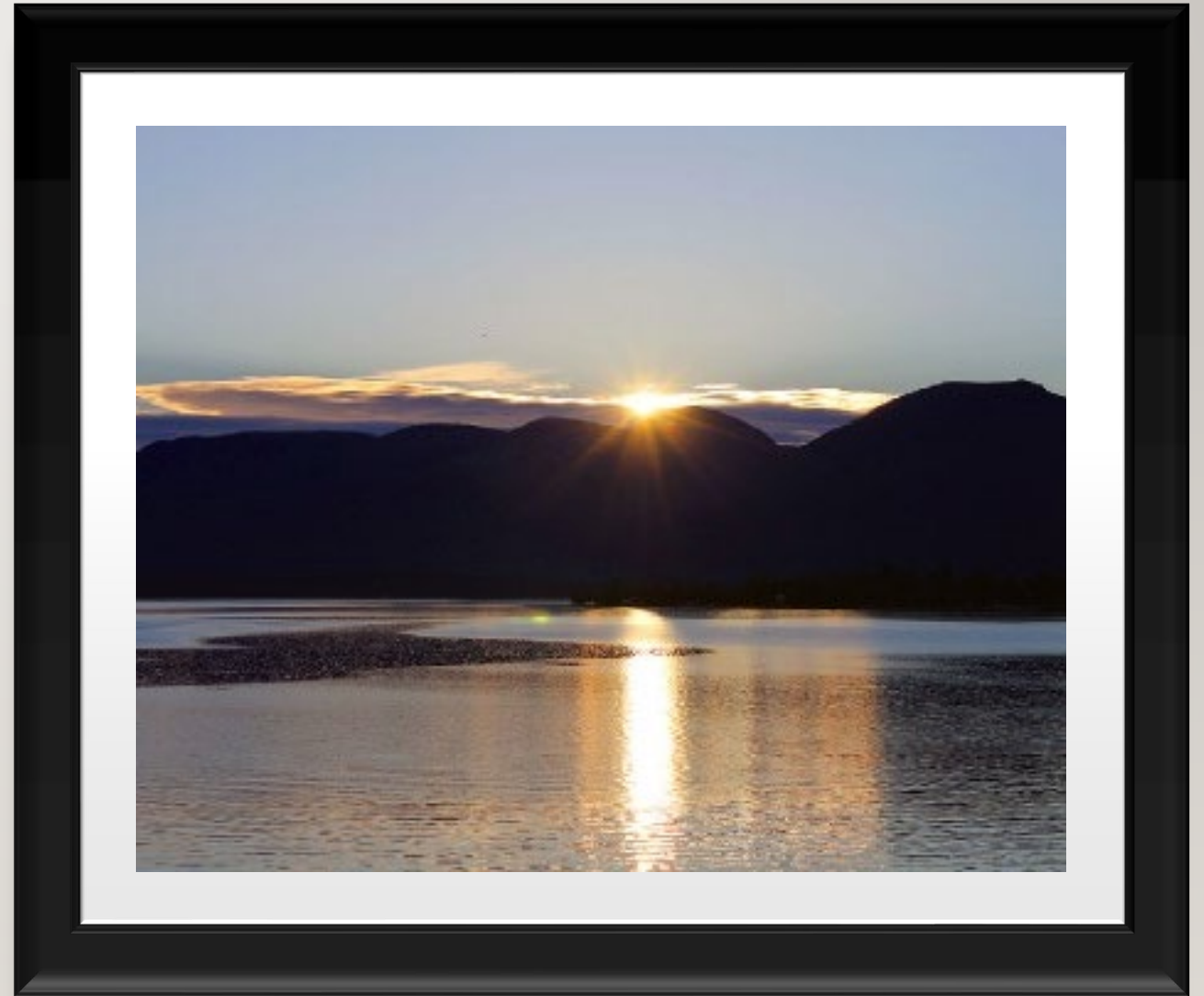
STEPS IN THE PLAN

- Decide on the instructional plan based upon the Needs Assessment.
- Discuss what supplies will be needed by the public school and private to run the program (Third-party provider)
- What types of professional development will be needed
- How, when, and what types of assessments will be used to determine progress
- Exiting criteria
- Program evaluation



PROGRAM ASSESSMENT

- Program should be assessed for effectiveness at the end of the year
- Students should be assessed before program entry, during the program, and at the end of the year
- Next steps should be discussed with the private school
- Prepare for the next year



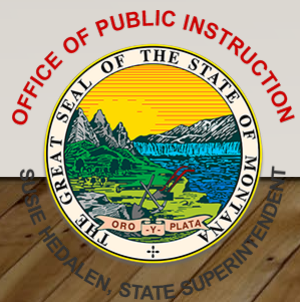
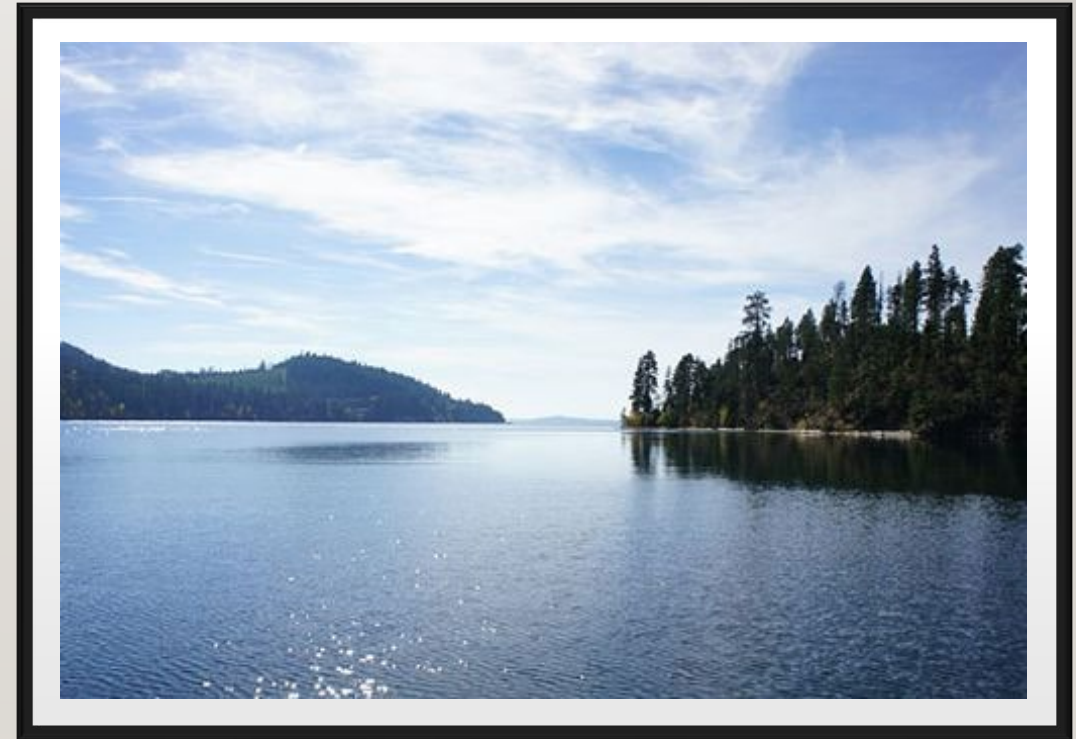
ALLOCATING FUNDS

- There are five main sources to determine poverty data:
 - Census count
 - Free and reduced lunch
 - Temporary Assistance for Needy Families (TANF)
 - Medicaid assistance
 - Proportionality
- These processes may be difficult in a private school, but it can be done every two years



EQUITABLE SHARE SET ASIDES

- The equitable share is now determined before district level set asides
- This increases the funds available to the private schools
- All funds must be expended in the year they were allocated-there is no more carryover of equitable share dollars unless there was some unforeseen situation



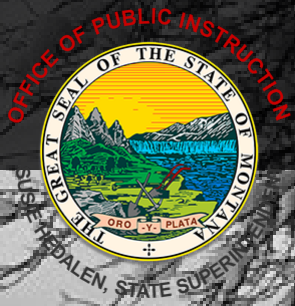
TRANSFER ORDER

- **After consultation**, even if the non-public objects, the district can move funds from one federal program to another, even if this removes all federal funds from a program.
- For example, the district moves Title II, III, and IV funds to Title I. This means that there would be no equitable share funds for the private school in those programs as the fund balance would be zero. However, there would be an increase in the equitable share dollars for Title I.
- LEA must give due consideration to the request of non-public entity in the event there is disagreement.
- Funds may not be left behind in a federal program just for equitable share.
- The equitable share for this situation would be based upon any amount left behind.



TYPES OF SERVICES

- LEA designs the Title I program with input from the private school
- Must supplement and be well coordinated with the regular program
- Service types: instructional services, extended day, family literacy, counseling, computer-aided instruction, home tutoring, etc.
- Must be secular, neutral, and nonideological



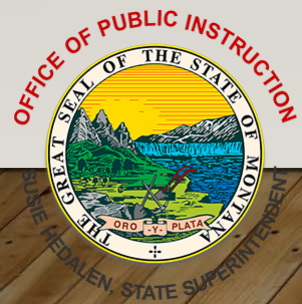
TARGETED ASSISTANCE SERVICES

- Title I services to private school students must be set up like a TAS program
- Students must be identified for services based upon multiple, educationally-related criteria
- Must develop a prioritized list of eligible students
- Materials and supplies purchased must supplement the regular educational program at the private school



QUALIFICATIONS OF TITLE SERVICE PROVIDERS

- Teachers and paraprofessionals who are employed by the LEA must meet the licensed/certified rules under the ESSA
- Third-party providers
- Hires outside of existing contracts with LEA/private school
- All staff paid for with Title I funds are employees of the public-school during Title I instructional time



PROFESSIONAL DEVELOPMENT

- Should assist public and private school staff
- Must have meaningful consultation
- Services must be equitable and paid for by the public school
- Can share PD opportunities.
- Must only be for private school teaching staff directly working with identified Title I students, generally everyone in smaller non-publics



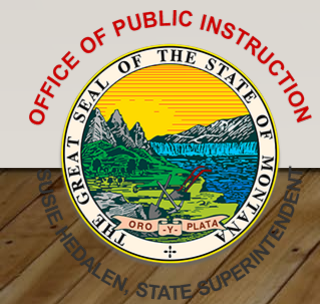
ADMINISTRATIVE COSTS

- Reasonable amounts may be set aside to run the program at the public and private school
- Third-party administrative costs are allowable
- Expenses: furniture, purchase or lease of property, insurance and maintenance costs, transportation, etc. Must be necessary for implementation of program
- Cannot be used to renovate the private school site



PURCHASING

- All requisitions must be done on the public school's forms
- The public-school buys airline tickets, makes reservations, pays all fees
- No funds can go to the private school!!!
- Other reimbursements can go to employees: per diem, parking fees, etc.
- All need to be agreed to in the consultation process



ALL TITLE I
NON-PUBLIC
BUDGET ITEMS
GO IN TITLE I A
BASIC BUDGET

Applicant: 

Click dropdown to access program specific pages:

Title I A - Basic

Application: 2025-2026 ESEA Consolidated Application - 00-
Cycle: Amendment 1

SchoolYear: 7/1/2025 - 6/30/2026

OVERVIEW

PROGRAM DETAIL

BUDGET PAGES

PAGE LOCK CONTROL

TARGETED ASSISTANCE
FULL-TIME EQUIVALENTS
TEXT

BUDGET DETAIL

PROPERTY AND
EQUIPMENT

BUDGET SUMMARY

Budget Detail

BUDGET BREAKDOWN (Use whole dollars only. Omit Decimal Places, e.g., \$2536)

[Click for Instructions](#)

This application has been approved. You must create an amendment in order to make updates.

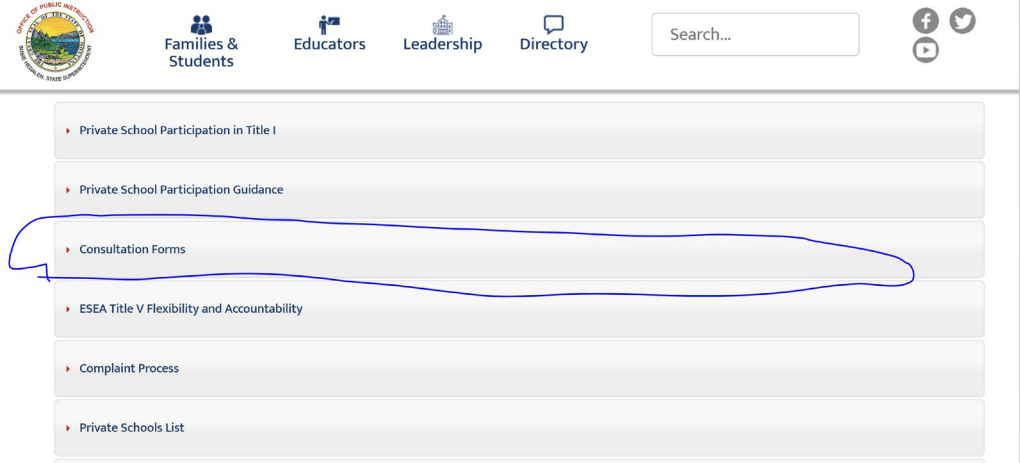
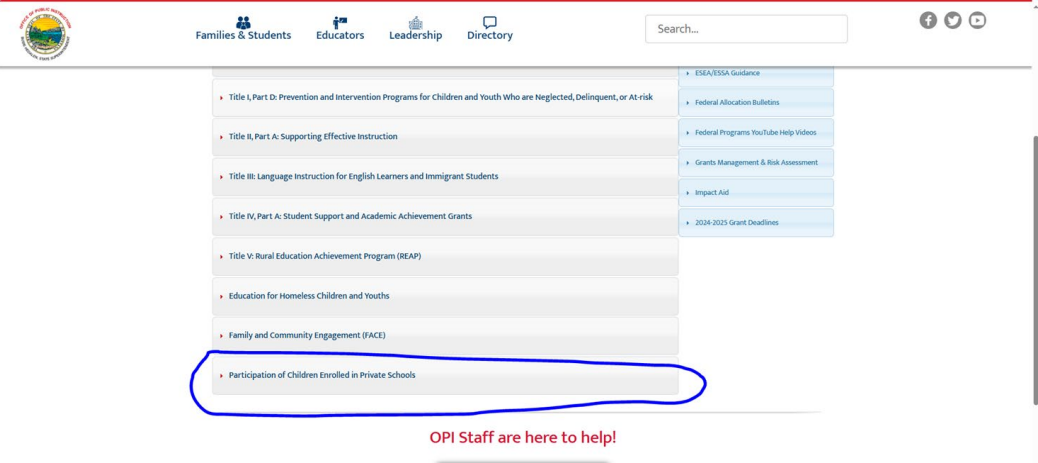
[Description of Purpose Categories and Object Codes](#)

Note: This Budget Summary displays to aid in creating and editing the Request and will not display once the Request is submitted to the SEA.

Paid to Date Amounts	100 Personal Service- Salaries	200 Employee Benefits	300 Purchased Professional and Technical	400 Purchased Property Services	500 Other Purchased Services	600 Supplies	700 Property & Equipment	800 Other Objects	Indirect Cost
	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Current Budgeted Amounts by Object Code	\$0	\$0	\$0	\$0	\$0	\$942	\$0	\$0	\$0



WEBSITE AND FORMS



QUESTIONS??

- Zach Hawkins
- zachariah.hawkins@mt.gov
- 406-444-3083

