



PRIVATE NON-PUBLIC (PNP) GUIDE

DETROIT PUBLIC SCHOOLS COMMUNITY DISTRICT

3011 WEST GRAND BLVD.
DETROIT, MICHIGAN 48202

PRIVATE NON-PUBLIC (PNP) GUIDE

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GENERAL INFORMATION

MISSION

We educate and empower every student, in every community, every day,
to build a stronger Detroit.

VISION

All students will have the knowledge, skills, and confidence necessary
to thrive in our city, our nation, our world.

OUTSTANDING ACHIEVEMENT

Dramatically improve the academic experience of all students
to ensure they are college and career ready.

CONTACT INFORMATION

For questions, concerns or comments regarding Private Non-Public, contact the
Office of Finance at:
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GUIDE PURPOSE

The Elementary and Secondary Education Act (ESEA) requires participating local educational agencies to provide eligible children attending private elementary and secondary schools, their teachers, and their families with Title (I, II, III and IV, as applicable) services that are equitable to those provided to eligible public school children, their teachers, and their families.

After meaningful consultation with appropriate private school officials, the Detroit Public Schools Community District (DPSCD) is responsible for planning, designing, and implementing the Title equitable services program (ESEA section 1117(a)(1)(A), (b)(1) and (d)). This manual serves as a guide for the administration of Board Policy to ensure the proper implementation of these services.

Guide Scope

Intended audience: The primary audience for this guide is Private Non-Public (PNP) principals and administrators who choose to participate in the DPSCD PNP program.

Board Policy References

PO 6110 Grant Funds
PO 6320 Purchasing
PO 6325 Procurement – Federal Grants/Funds
PO 6470 Payment of Claims
PO6550 Travel Payment & Reimbursement

DPSCD board policies are available online: <https://go.boarddocs.com/mi/detroit/Board.nsf/Public#>

Forms

All DPSCD Private Non-Public forms are available online at <https://www.detroitk12.org/Page/11757>

GENERAL CALENDAR

Date	Activity
August	1 st Meaningful Consultation
August	Deadline to Submit Requests and Reimbursements
September	Fiscal Year Begins - Equitable Services Begin
October	2 nd Meaningful Consultation
November	PNPs Submit Fall Enrollment for Next Year Allocations
November	Budget Amendment Period Begins
December	Budget Amendment Period Ends
January	DPSCD Submits Amended Consolidated Application to MDE
February	3 rd Meaningful Consultation
February	PNPs Begin Comprehensive Needs Assessments
February	Budget Development Begins DPSCD Distributes Tentative Allocations
February	Deadline for PNPs to submit Intent to Participate Letters to DPSCD
April	Budget Development Ends Budgets and Comprehensive Needs Assessments are Due
June	DPSCD Submits Consolidated Application to MDE
June	4 th Meaningful Consultation
July	Vendor Introduction Meeting (PNP's, Approved Vendors, DPSCD)
July	Service Delivery Plans are created and Signed by PNP, Vendor and DPSCD

INTENT TO PARTICIPATE

DPSCD will mail participation letters to all eligible PNP schools in January. PNP schools that desire to participate in equitable services must complete and return the participation form within 30 days. Only schools that choose to participate in the program and are approved by the Michigan Department of Education are eligible to receive services.

MEANINGFUL CONSULTATIONS

DPSCD and PNP consultations provide a genuine opportunity for all parties to express their views and to have their views given serious, due consideration. The general purpose is to discuss viable options for ensuring equitable participation and to reach agreement regarding the provision of equitable services.

DPSCD is committed to offering four group consultations per year to discuss the implementation of the PNP program, share updates and ensure that the services are meeting the needs of eligible students. DPSCD will also offer individual consultations to discuss budgets, delivery plans, and any concerns schools may have.

The District is required to maintain written affirmation of whether timely and meaningful consultations have occurred and that the PNP administrator and DPSCD are in agreement. PNP administrators will be able to indicate their belief that timely and meaningful consultations have not occurred or that the program design is not equitable with respect to eligible private school children (ESEA section 1117(b)(5)).

If a PNP administrator and DPSCD are unable to agree on any issue discussed in consultation, DPSCD will provide a written response to explain our stance and rationale (ESEA section 1117(b)(2)).

COMPREHENSIVE NEEDS ASSESSMENT

The Comprehensive Needs Assessment (CNA) is a tool to assist schools in determining the strengths and challenges of their school. The CNA assesses school information, student data, as well as the system processes and protocols of practice that are in place to support student academic achievement. All participating schools must submit a CNA in the spring to support their proposed budget and services.

Schools must consult with a broad range of stakeholders, including school staff and parents and examine relevant academic achievement data to understand students' most pressing needs and their root causes (ESEA section 1114(b)(2); 34 C.F.R. § 200.26(a)).

DESCRIPTION OF FUNDING SOURCES

The ESEA requires that Title funds supplement State and local funds. With respect to equitable services, 34 C.F.R. § 200.66 requires that DPSCD ensures that the equitable services it provides supplements services a private school would otherwise provide and may not replace the education for participating students that the private school provides all students.

Title I, Part A is designed to help children achieve academic success. Students at-risk of failing to achieve academically are eligible for services that supplement regular instruction and help students meet core academic curriculum standards. Eligible private school children are children who reside in DPSCD's attendance area and are low achieving.

Title II, Part A is designed to provide students with greater access to effective educators. This includes, but is not limited to, professional learning for all educators, and teacher coaching.

Title III, English Language Acquisition is designed to help children who are limited in English proficiency attain English proficiency, develop high levels of academic attainment in English, and meet the same challenging State academic content and student academic achievement standards that all children are expected to meet.

Title IV, Part A is designed improve students' academic achievement by increasing the capacity to provide students with a well-rounded education (e.g., college and career counseling, STEM, music and arts), supporting safe and healthy students (e.g., comprehensive school mental health, drug and violence prevention, health and physical education) and supporting the effective use of technology (e.g., professional development, blended and personalized learning).

ALLOCATIONS

Schools located within DPSCD boundaries are eligible for Title I, II, III and IV allocations. Schools located outside of DPSCD boundaries are only eligible to receive Title I allocations. Schools outside of DPSCD boundaries should contact their local educational agency to receive additional services.

The level of services available to your school under the Title I and Title III programs is based on your documentation of student eligibility. Title I allocations are based on the low-income (free and reduced lunch) Detroit student enrollment. Title III allocations are based on the English Language Learner enrollment. Title II & IV allocations are based on the school's total enrollment. All allocations are based on the student enrollment data from the previous year's fall count.

DPSCD currently uses the Michigan Department of Education's (MDE) Participating Private Schools' Equitable Services Calculation Worksheet (available on [MDE's website](#)) to determine Title I, II & IV PNP allocations. Title III allocations are based on a per pupil amount provided by MDE yearly.

PNPs will receive an estimated allocation during budget development. Final allocations will be provided in the fall after MDE provides DPSCD with its final allocation.

Student Enrollment & Allocations

As mentioned, PNP allocations are based on student enrollment. Participating schools will be asked to provide a list of names, addresses and grades of low-income students (for Title I), the number of English Language Learners (for Title III) and the total school enrollment (for Title II & IV). Proof of low-income status (i.e. free or reduced lunch documents) must be kept on file for auditing purposes.

Participating schools will be asked to submit student enrollment data to the District yearly in November. This data will be used to determine the PNP allocations for the following year. Private school officials should maintain the student data in their files for auditing purposes.

Pooling Funds

A group of private schools (such as a group of schools under the authority of a single organization) may pool their allocations. The funding must provide services to support the students with the greatest educational needs. Participating schools must indicate their desire to pool funding in writing.

If a group of private schools will be represented by a single official, that representative should inform the LEA in writing that she/he will serve as the designated primary contact for such schools and provide a list of the private schools that she/he represents.

CONSOLIDATED APPLICATION

MDE requires that local educational agencies submit budgets and amendments for Federal funding into the Consolidated Application. The application is comprised of detailed budget requests and must be submitted in order to receive Federal funds. PNP budgets and amendments must be included in this application and will be entered by the District. MDE will review and either approve or request modifications for each PNP request. The District must provide MDE with the initial budget by July 1, and amendments by January 15 each year.

BUDGET DEVELOPMENT

Budget development is a collaborative process that involves many stakeholders. The budget should be reflective of student needs, as determined by the school's CNA. The budget serves as an operational plan, stated in financial terms, and is due every spring. DPSCD will provide estimated allocations to PNP schools for budget development. Timelines and key dates are available in the PNP Calendar provided during each meaningful consultation.

Steps

1. PNPs complete their CNA.
2. PNPs enter their proposed budget into the budget matrix form.
 - a. DPSCD will work with and support PNP administrators with developing their budgets and completing the required forms.
3. DPSCD will review the budget and continue to work with the PNP administrator as needed.
 - a. Budgets must meet the grant requirements and include sufficient details.
4. Upon DPSCD approval, budgets will be entered into the District's Consolidated Application and submitted to MDE.
 - a. DPSCD will work with PNP administrators to resolve any concerns or modifications requested by MDE.
5. PNP administrators will be notified once their budget has been approved by MDE.

BUDGET AMENDMENTS

Significant budget revisions (e.g. new services, travel requests, etc.) require DPSCD and MDE approval and must be added to the District's Consolidated Application. MDE allows DPSCD to amend the Consolidated Application once per year in the fall.

Steps

1. PNPs will enter their amendment requests into the budget matrix form.
 - a. DPSCD will work with and support PNP administrators with developing their budgets and completing the required forms.
2. DPSCD will review the amendments and continue to work with the PNP administrator as needed.
3. Upon DPSCD approval, the amendments will be included in the District's Consolidated Application and submitted to MDE.
 - a. DPSCD will work with PNP administrators to resolve any concerns or modifications requested by MDE.
4. PNP administrators will be notified once their budget has been approved by MDE.

VENDOR SELECTION

The District conducted a competitive bidding process to identify vendors for the following services.

- Core Academic Support
- Conflict Resolution
- Professional Development
- Parent & Family Engagement

DPSCD will hold a vendor introduction meeting annually, during the summer, once vendors have been approved and notified of their selection. Prior to the meeting DPSCD will send out descriptions of each vendor to the PNP's.

PNP administrators may create service delivery plans with any of our approved PNP vendors (in accordance with the grant allocation(s)). Vendors are contracted by, and report to DPSCD officials. Vendor-related concerns should be directed to DPSCD, not the vendor. Additional details regarding the District's procurement process are included in the Procurement section of this guide.

SERVICE DELIVERY PLANS

Service delivery plans describe what, when, where and how services will be provided. The plans are created collaboratively with PNP administrators, DPSCD and the selected vendor(s). The service delivery plan must align with the CNA and the budget.

PNP administrators should suggest ideas, program designs, and program modifications that meet the needs of their eligible children, their teachers, and their families. After meaningful consultation with appropriate private school officials, DPSCD is responsible for planning, designing, and implementing the Title program and may not delegate that responsibility to the private schools or their officials (ESEA section 1117(a)(1)(A), (b)(1) and (d)).

Title I services begin in the fall and may be provided to private school children who reside in a DPSCD attendance area and are low achieving. Private school officials are required to provide the list of names, addresses, and grade levels of the children who are lowest achieving and have been selected to receive Title I services.

Title services or other benefits, including materials and equipment, must be secular, neutral, and non-ideological (ESEA section 1117(a)(2)).

MATERIALS AND EQUIPMENT

Title funds may only be used to purchase materials and equipment to meet the needs of eligible students. Non-Title private school students may not use materials and equipment purchased with Title funds. Materials and equipment should be stored in a secure location when not in use.

Section 1120(d)(1) of the ESEA requires that the control of the Title funds, and the ownership of the materials and equipment, purchased with Title funds for private schools remain with DPSCD. The District is responsible for ordering, labeling and delivering materials and/or equipment to the private school.

PROCUREMENT

Private school officials have no authority to obligate or directly receive Title funds. Vendors must implement services in accordance with their purchase order. Costs related to unapproved goods or services will be the responsibility of the private school. The ESEA requires the LEA to maintain control of Title funds, materials, equipment, and property (ESEA section 1117(d)(1)). Thus, no Title funds may be paid to a private school, even as reimbursement.

The District is committed to supporting schools with the purchase and payment of goods, materials, supplies and services. The procurement process involves multiple Finance Departments including Grant Compliance, Procurement, and Accounts Payable.

Any purchase or combined purchases with a single vendor greater than \$250,000 requires School Board approval. Any purchase or combined purchases with a single vendor greater than \$750,000 or, for more than 2 years, may take up to 90 days for approval.

COMPETITIVE SOLICITATIONS

The District is required to issue competitive solicitations for the purchase of any good, material, or supply over the state bid threshold, currently \$24,459, and any purchase of services over \$150,000. Most often in these instances, the Procurement Department will use the request for quote (RFQ) and request for proposal (RFP) method.

REQUIREMENTS FOR PURCHASES OF GOODS (SUPPLIES, MATERIALS, EQUIPMENT, ETC.)

Less than \$10,000: At a minimum, one formal quote from a supplier must be provided. If you have secured more than one quote, please provide those as well. The Procurement department will do further due diligence to secure other quotes if only one quote is attached, as may be required. Procurement may also conduct a comparison check for these requisitions.

Between \$10,001 - \$24,459: These requests require that multiple quotes be obtained. Attach all quotes and/or supporting materials to the request.

Above \$24,459 (*bid threshold established by the State, changes annually*): Requisitions for goods, supplies, or equipment greater than \$24,459 require a competitive, open solicitation. These requisitions will require the development of a formal Scope of Goods Required that is publicly posted to solicit bids. This process requires at least four to six weeks for the development of the scope, acceptance of proposals, evaluation of proposals, and award.

REQUIREMENTS FOR PURCHASES OF SERVICES

Less than \$10,000: At a minimum, one formal quote from a supplier must be attached to the request. If you have secured more than one quote, please provide those as well. The Procurement department will do further due diligence to secure other quotes if only one quote is attached, as may be required. Procurement may also conduct a comparison check for these requests.

Between \$10,001 - \$150,000: These requests require that multiple quotes (between 3 to 5) be obtained. Attach all quotes and/or supporting materials to the request. The Procurement department will do further due diligence to secure other quotes if only one quote is attached, as may be required.

Above \$150,000 (*bid threshold established by the Federal Government*): Requests for services greater than \$150,000 require a competitive, open solicitation. This process requires at least four to six weeks for the development of the scope, acceptance of proposals, evaluation of proposals, and award.

APPROVAL TIMELINES

The timelines below indicate the optimal processing time once a request has been submitted. These time windows assume that all information required in the request is submitted accurately and completely.

- Less than \$10,000: Up to 14 days
- Between \$10,000 and \$24,459: Up to 30 days
- Above \$24,459 (for goods and supplies) and \$150,000 (services): 60 – 120 days

PURCHASING PROCESS

The purchasing period for goods and services is September 1 – August 31. Complete the following to request goods or services.

Steps

1. Complete the [Request for Private Non-Public Goods or Services form](#) and include the following:
 - Funding Source – Title I, II, III, or IV
 - Clear Description – Ensure the description is clear and contains a thorough approval justification
 - Documentation – Any additional documentation available should be attached to expedite approval
2. Submit the Request form to DPSCD by emailing and attaching files.
3. DPSCD will either approve the request, deny the request (with an explanation), or request additional information.
4. Approved requests will be routed through DPSCD's internal procurement process. DPSCD will issue payment for vendor services and/or goods directly to the supplier.

REIMBURSEMENT PROCESS

To ensure allowability and funding, all reimbursements must be pre-approved by submitting the Request for Private Non-Public Goods or Services form and [Travel Approval form](#) (as applicable). Reimbursement documentation should be submitted within 7 days of the activity concluded. All reimbursement documentation must be fully processed by October. Schools may not be reimbursed. Reimbursements are only available for individuals.

Steps

1. Complete the Request for Private Non-Public Goods or Services form and include the following:
 - Funding Source – Title I, II, III, or IV
 - Clear Description – Ensure the description is clear and contains a thorough approval justification
 - Documentation – Any additional documentation available should be attached to expedite approval
 - a. Individuals must have a DPSCD Supplier ID number to receive funds from DPSCD. Submit an [Internal Request for DPSCD Supplier ID Number form](#) and [W9](#) with your request. These forms must only be completed once.
2. Obtain a quote if your reimbursement involves paying for services and/or consultants. Multiple quotes are required if the services are between \$10,001 - \$24,459.
3. Submit the Request form (and a quote, if applicable) to DPSCD.
4. DPSCD will either approve the request, deny the request (with an explanation), or request additional information.
5. Once the activity has been completed, submit receipts and documentation to DPSCD.
6. Approved requests will be routed through DPSCD's internal payment process. A check will be mailed to the requesting individual.

CONFERENCES AND TRAVEL

All conference and travel costs must be approved by DPSCD and MDE.

Out of state requests must be submitted at least **90 days** before the first date of travel to accommodate approval timelines. Ideally, all travel requests will be submitted the during budget development in the spring or during the amendment period in the fall.

Per Diems - A per diem is an advanced payment to cover meals and incidentals. Neither per diems nor meals are allowed for in-area or one-day travel. Official per diem rates are available at www.gsa.gov. The rate is reduced to 75% on the first and last day of travel. If travel has already occurred, a reimbursement request may be submitted and must be based on actual receipts instead of the set per diem rate.

After-Travel Requirements – Participants will need to submit the [After-Travel form](#) and proof of travel documents (hotel check-out bill, boarding passes, and any other documents that demonstrate actual attendance) within 10 days of their return.

Conference and Travel Process

Complete the following to travel or attend conferences.

Steps

1. Include conference and travel requests in your school budget (spring) and/or budget amendment (fall).
2. Complete the [Travel Approval form](#) and include the following:
 - Funding Source – Title I, II, III, or IV
 - Clear Description – Ensure the description is clear and contains a thorough approval justification
 - Documentation – Any additional documentation available should be attached to expedite approval
 - a. Individuals must have a DPSCD Supplier ID number to receive funds from DPSCD. Submit an Internal Request for DPSCD Supplier ID Number form and W9 with your request. These forms must only be completed once.
3. Submit the documents to DPSCD by emailing david.cardinal@detroitk12.org
4. DPSCD will either approve the request, deny the request (with an explanation), or request additional information.
5. Approved requests will be routed through DPSCD's internal procurement process. Per diem checks will be mailed to the requesting individual (as applicable).

PROGRAM MONITORING

DPSCD must annually evaluate the services it provides to determine the progress being made in meeting participating students' academic needs (ESEA section 1117(a)(1)(A), (b)(1)(D)). As part of this process, each year District vendors must consult with appropriate private school officials to determine how the services will be academically assessed and how the results of that assessment will be used to improve those services (ESEA section 1117(b)(1)(D)). DPSCD will perform onsite monitoring of its PNP program and vendors. These visits are to ensure that the agreed upon services are being provided and that adequate records are maintained.

CONTACT INFORMATION

It is our mission to educate and empower every student, in every community, every day, to build a stronger Detroit. We are looking forward to overseeing equitable services for Detroit schools and students and we are committed to working collaboratively with our Private Non-Public educational partners. We hope that this guide has addressed any question or concerns that you may have. If you have any additional concerns, please don't hesitate to contact us.

Contact	Title	Phone	Email
David Cardinal	Program Supervisor	(734) 748-0888	David.cardinal@detroitk12.org
Kena Halliburton	Senior Director	(313) 870-3469	Kena.halliburton@detroitk12.org
Jeremy Vidito	Chief Financial Officer	(313) 873-6149	Jeremy.vidito@detroitk12.org

Complaint Process

Should you have a complaint, we ask that you contact David Cardinal, PNP Supervisor, (734) 748-0888 to discuss potential solutions. In addition, an individual consultation meeting where all parties can come together to resolve any issues may be necessary. If your concern is not resolved in a timely manner you may then direct your concern to Kena Halliburton, Senior Director of Grant Compliance, (313) 870-3469.