



# Blueprints to Compliance: Building Equitable Services for Private Nonprofit (PNP) Schools That Pass Inspection



FPC Statewide Spring Virtual Training 2026  
May 19, 2026  
9:00 a.m. – 10:30 a.m.



**Federal Program Compliance Division  
Statewide Spring Virtual Training 2026**

**Blueprints to Compliance:  
Building Private Nonprofit (PNP) Equitable Services  
That Pass Inspection**

**May 19, 2026**

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ESSA Private Nonprofit (PNP) Ombudsman and  
Title IV, Part A, Program

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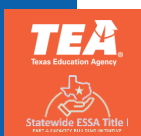
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## Presentation Check-in



- Select Event Name: **Statewide - Blueprints to Compliance: Building PNP Equitable Services that Pass Inspection - presented by LaNetra Guess, 5/19/2026**
- Select Program: **Private Nonprofit (PNP)**
- Enter First Name and Last Name
- Enter Role (Position Title)
- Provide Email Address (Optional)
- Select LEA, ESC, or Other
  - LEA: Select LEA Name or Type LEA Name to find LEA Name
  - ESC: Select ESC Region Number
  - Other: Enter the name of your organization

<https://app.smartsheet.com/b/form/d522823a7cf34fd7ad3e1c905d4f28e6>

## What do you know about ESSA Title Equitable Services for Private School Students and Staff?



### True or False

1. It must be used as supplemental education support to the private school's curriculum.
2. It can be used for any low-achieving private school student.
3. It is calculated by using the participating private school's student enrollment.
4. It can be used as a schoolwide program if the private school's Campus Improvement Plan (CIP) documents a need for additional student support.
5. It can be used for private school teachers to attend faith-based conferences for professional development.





**PNP Equitable Services:  
The Basics**

## Private, Nonprofit, and Nonpublic Entities



### **Private**

The [Code of Federal Regulations \(CFR\), Title 34, Subtitle A, Part 77.1](#) defines *private*, as applied to an agency, organization, or institution, that it is not under Federal or public supervision or control.

### **Nonprofit**

The [Code of Federal Regulations \(CFR\), Title 34, Subtitle A, Part 77.1](#) defines *nonprofit* as an agency, organization, or institution, owned and operated by one or more corporations or associations whose net earnings do not benefit, and cannot lawfully benefit, any private shareholder or entity.

### **Nonpublic**

The [Code of Federal Regulations \(CFR\), Title 34, Subtitle A, Part 77.1](#) defines *nonpublic* as an agency, organization, or institution that is nonprofit and not under Federal or public supervision or control.

## Verifying PNP School Nonprofit Status



**How might a LEA verify if a Texas private school has been provided federal nonprofit 501(c)(3) status?**

The LEA may search the [Texas Comptroller of Public Accounts](#) and [Internal Revenue Service \(IRS\) Tax Exempt Organization Database](#) to verify if the private school has received state and/or federal nonprofit status.

## Equitable Services Must Be...



- Secular, neutral, and non-ideological for all educational services, materials, and equipment
- Equitable educational services compared to public school
- Provided in a timely manner
- Monitored and enforced by PNP Ombudsman



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## ESSA Eligible Programs for Equitable Services



### Title I, Part A – ESSA, Section 1117

### Title VIII Programs – ESSA, Section 8501

- Title I, Part C
- Title II, Part A
- Title III, Part A
- Title IV, Part A
- Title IV, Part B (21<sup>st</sup> Century Community Learning Centers)



## Program Eligibility



- For Title I, Part A, equitable services, a private school student *must reside in an eligible Title I, Part A, attendance center*, meet eligibility, and have an educational need.
- For Title I, Part C; Title II, Part A; Title III, Parts A - English Learners and Immigrants; and Title IV, Part A, private school campuses must be located within district boundaries and meet program eligibility for students and staff served.




**PNP Affirmation of Consultations  
and  
PNP Affirmations WorkApp**

## LEA Documentation of Consultation



- Signed PNP Affirmation of Consultation form
  - Submitted via FPC PNP Affirmations WorkApp
- Result of Agreement
- Reason for Disagreement




**Federal Program Compliance Division**  
**Affirmation of Consultation with Private Nonprofit (PNP) School Officials:**  
**Formula Grants**  
**School Year 2025-2026**


**II. Timely and Meaningful Consultation/Equitable Program Design**

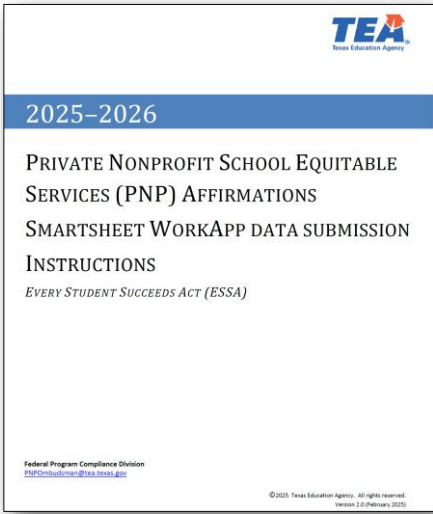
For *each* LEA's funded Title program, it must consult with PNP officials. In consultation, the LEA selects "Yes" or "No" in response to all programs indicating the following occurred: (a.) Timely and meaningful consultation with the PNP has occurred and is ongoing, **and** (b.) Program design is equitable with respect to eligible private school children.

Title I, Part A	Title I, Part C	Title II, Part A	Title III, Part A--EL	Title III, Part A--IMM	Title IV, Part A
<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No

\*Per ESSA Section 1117(b). Title I, Part A: Section 8501(c) for Title I, Part C: Title II, Part A: Title III, Part A--EL: Title III, Part A--IMM: and Title IV, Part A

**PNP Affirmation of Consultation Form – Formula Grants** 





2025-2026

PRIVATE NONPROFIT SCHOOL EQUITABLE SERVICES (PNP) AFFIRMATIONS  
SMARTSHEET WORKAPP DATA SUBMISSION  
INSTRUCTIONS


*EVERY STUDENT SUCCEEDS ACT (ESSA)*

Federal Program Compliance Division  
[PNPOmbudsman@tea.texas.gov](mailto:PNPOmbudsman@tea.texas.gov)

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Version 2.0 (February 2025)

2025-2026 PNP School Equitable Services Affirmations Smartsheet WorkApp Data Submission Instructions

## 2025-2026 PNP Affirmation Data Submission Timeline



### PNP Affirmation Data Submissions

- Private Nonprofit (PNP) Affirmation Smartsheet submissions via FPC *PNP Affirmation Smartsheet WorkApp*
  - LEAs must submit ***one signed Affirmation per*** participating PNP school in Smartsheet
    - (i.e., LEA with 12 participating PNP schools will submit 12 *separate* Affirmations *through* 12 Smartsheet data submissions)
- LEAs ***do not*** submit Affirmations for non-participating PNP schools
- LEAs, with access, may review all submitted Affirmations and data through the FPC *PNP Affirmation WorkApp*

PNP Affirmation Smartsheet Submission Reporting Begin Date	PNP Affirmation Smartsheet Submission Reporting Due Date	PNP Affirmation Revisions (if applicable) Reporting Date	25-26 ESSA Consolidated Federal Grant Application Final Amendment Due Date
July 1, 2025	September 30, 2026	<b>May 1, 2026*</b> <small><i>Ombudsman Suggested Affirmation Amendment Date*</i></small>	June 2, 2026

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## PNP Affirmation Smartsheet WorkApp: Tips and Reminders



- *Revised* PNP school Affirmations must be submitted within the WorkApp, under the same PNP school name, *not* through the Smartsheet data form.
- Ensure all PNP school Affirmations correctly represent equitable services provided in each. If not, update Smartsheet data and attach revised Affirmation *through the WorkApp* before final ESSA Consolidated Grant Application Final Amendments are due in June.
- Submit any issues through the FPC WorkApp Help form

## PNP Affirmations Smartsheet Smartsheet WorkApp



### Federal Program Compliance PNP Affirmations Smartsheet WorkApp

- Accessible to all LEAs, ESCs, and SSAs to submit data through the PNP Affirmations Smartsheet Data form.
- There is a limited number of staff who have access to the PNP Affirmations WorkApp.
- <https://app.smartsheet.com/b/form/472a3c9e92124e4ca4ec47549cba69f9>

### Department of Grant Compliance and Administration WorkApp System

- Only accessible for a limited number of LEA and ESC staff
- <https://workapps.smartsheet.com/app/wqcxWfhphMCmV8pVGQhH7w2MJQ/gFR9Qjq7vg7RM>

## FPC General WorkApp Help Form\*



FPC General WorkApp Help Form Link:

<https://workapps.smartsheet.com/app/MRH6Hr248mJQGH82MxvQP7GJX5/MHJh2wXMX4Fh2>

\*Use this form to submit issues School System/ESC staff are experiencing with Federal Program Compliance Division TEA WorkApp Projects.





**Consultation: Obligation of Funds and  
Unforeseen Equitable Services Carryover**

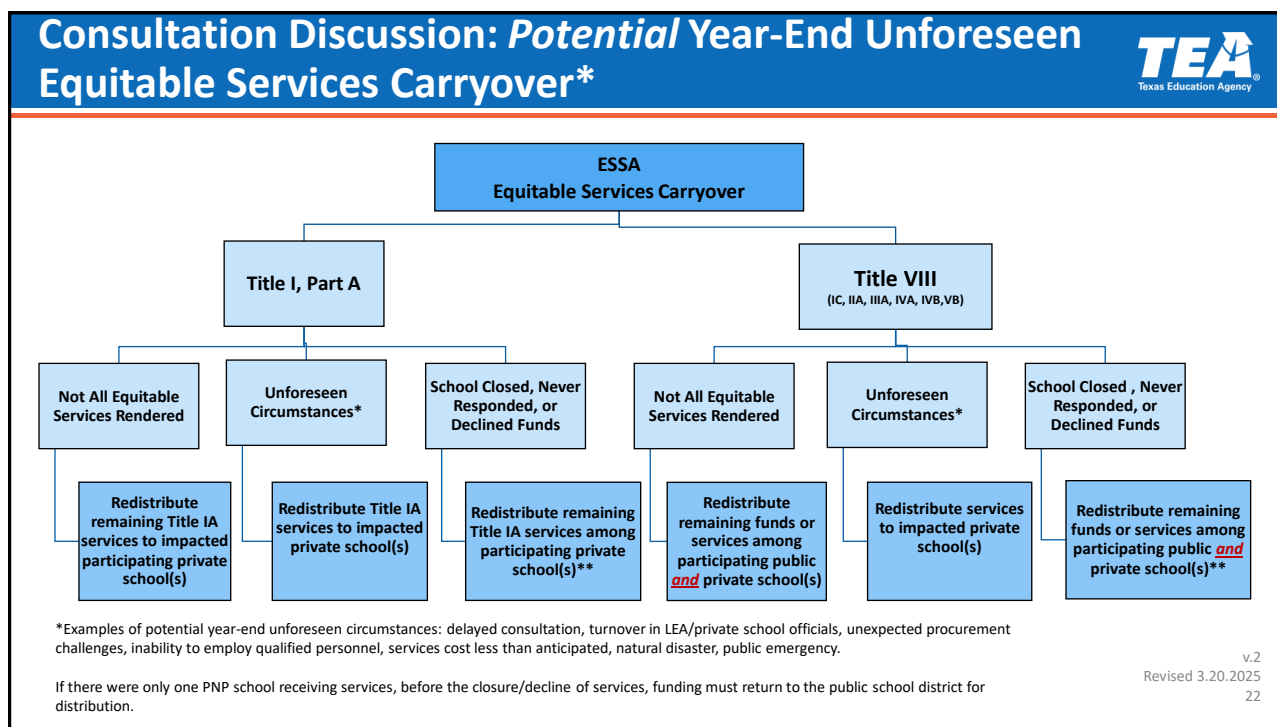
## Consultation Meeting: Obligation of Funds\*



- Funds provided to a LEA for equitable services to eligible private school students, teachers, educational staff, and families *should be* obligated in the fiscal year in which they are received.
  - LEAs may set *reasonable deadlines* during consultation to ensure services are delivered and expenses are recorded before year-end.
- Sometimes, unexpected circumstances arise, and the LEA may be unable to deliver all planned equitable services within the intended timeline.
  - When this occurs, funds *may carry over* and remain available to provide equitable services during the next school year, in accordance with federal program rules.

**\*In determining how such carryover funds will be used for equitable services, the LEA must consult with private school officials.**

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## Poll: Which PNP resource(s) and/or training sessions have you used this year? (can select all)




1. TEA PNP **virtual** training session(s) (not including today's session)
2. TEA PNP **onsite** training session(s) (not including today's session)
3. TEA's PNP website resources
4. TEA PNP Program Guide
5. TEA PNP Frequently Asked Questions
6. ESC 14 PNP Capacity Building Statewide Initiative (CBSI) website resources
7. Local ESC PNP **virtual** training session(s)
8. Local ESC PNP **onsite** training session(s)
9. None.

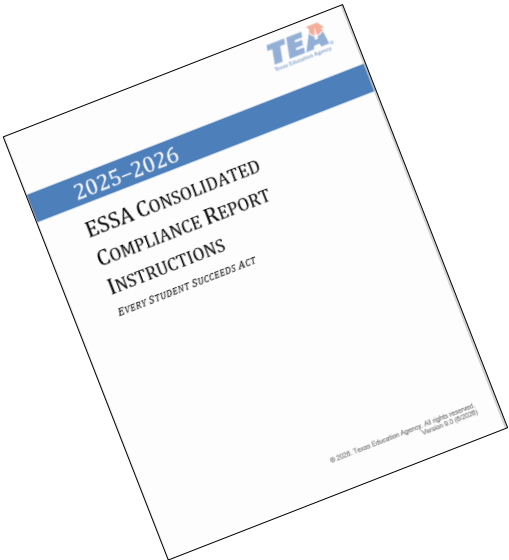


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# Private Nonprofit (PNP): LEA Program Compliance and Self-Checks



PR3099 – PNP Compliance Report (example)




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Version 5.0 (05/2025)

<Name of Grant Program>
Instructions

Program Description

PS3099 - Private Nonprofit (PNP) School Equitable Services

Part 1: Private Schools Consultation and Participation

A. Private Schools Consultation

1. Are any private nonprofit schools located within the LEA's boundaries?  Yes  No
2. Does the LEA have any Title I, Part A eligible students attending private nonprofit schools outside the boundaries?  Yes  No

B. Are any private nonprofit schools participating?

Title I, Part A	Title I, Part C Migrant	Title II, Part A	Title III, Part A ELA	Title III, Part A Immigrant	Title IV, Part A-SSAEP
<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No

C. Assurances

1.  The LEA assures that it discussed all consultation requirements as listed in Section 1117(b)(1) and/or Section 8501(c)(1), as applicable, with all eligible private nonprofit schools located within the LEA's boundaries.
2.  The LEA assures the appropriate Affirmations of Consultation will be provided to the TEA Private Schools Ombudsman in the manner and timeline requested.

Part 2: Equitable Services Calculations

A. Equitable Services Calculation for Title I, Part A

Description	Calculation

## PR3099 – PNP Compliance Report, Part 1 – Private Schools Consultation and Participation Data



▪ **Part 1 – Private Schools Consultation & Participation**

Program Description					
PS3099 - Private Nonprofit (PNP) School Equitable Services					
<b>Part 1: Private Schools Consultation and Participation</b>					
<b>A. Private Schools Consultation</b>					
1. Are any private nonprofit schools located within the LEA's boundaries?					<input type="radio"/> Yes <input type="radio"/> No
2. Does the LEA have any Title I, Part A eligible students attending private nonprofit schools outside the boundaries?					<input type="radio"/> Yes <input type="radio"/> No
<b>B. Are any private nonprofit schools participating?</b>					
Title I, Part A	Title I, Part C Migrant	Title II, Part A	Title III, Part A ELA	Title III, Part A Immigrant	Title IV, Part A-SSAEP
<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
<b>C. Assurances</b>					
1. <input type="checkbox"/> The LEA assures that it discussed all consultation requirements as listed in Section. 1117(b)(1) and/or Section. 8501(c)(1), as applicable, with all eligible private nonprofit schools located within the LEA's boundaries.					
2. <input type="checkbox"/> The LEA assures the appropriate Affirmations of Consultation will be provided to the TEA Private Schools Ombudsman in the manner and timeline requested.					

**PR3099 – PNP Compliance Report, Part 2 (selected sections) –  
 Equitable Services Calculations, Title I, Part A**



**Part 2 – Equitable  
 Services Calculations**

- **Title I, Part A**
- Title I, Part C
- Title II, Part A
- Title III, Part A - EL
- Title III, Part A - Imm
- Title IV, Part A

**Part 2: Equitable Services Calculations**

A. Equitable Services Calculation for Title I, Part A	
Description	Calculation
1. Total low-income enrollment in LEA from participating Title I attendance areas	
2. Total eligible low-income students attending private schools who reside in a participating (or skipped) Title I attendance area based on one of the following methods (select the method used):	
a) <input type="radio"/> using the same measure of low income used to count public school children;	
b) <input type="radio"/> using the results of a survey that, to the extent possible, protects the identity of families of private school students, and allowing such survey results to be extrapolated if complete actual data are unavailable;	
c) <input type="radio"/> applying the low-income percentage of each participating public school attendance area, determined pursuant to this section, to the number of private school children who reside in that school attendance area; or	
d) <input type="radio"/> using an equated measure of low income correlated with the measure of low income used to count public school children.	
3. Calculated total number of low-income students in the LEA (A.1 + A.2)	
4. Total current year Title I, Part A allocation	\$
5. Transfer in from Title II, Part A	\$
6. Transfer in from Title IV, Part A	\$
7. Total allocation and transfer amount(s) (A.4 + A.5 + A.6)	\$
8. LEA per pupil allocation (A.7 / A.3)	\$
9. Calculated <grant year in XXXX-XXXX> Private School Reservation (A.2 X A.8)	\$
10. Administration of Title I, Part A program for eligible private nonprofit students. For independent projects this amount will equal to the administration reservation reported on PS3101, Part 1, C. Activities to be Conducted with Reserved Funds. Line 5.	\$
11. <b>Total Calculated Private School Reservation</b> (A.9 – A.10) For independent projects this amount will equal the private school reservation reported on PS3101, Part 1, C. Activities to be Conducted with Reserved Funds. Line 4.	\$
12. <b>Minimum Proportionate share of equitable services for parents and families</b> (A.7 X 1%) X (A.2 / A.3) (Optional if the total of current year allocation and transfer amount(s) is less than \$500,000)	\$
13. <b>Maximum Proportionate share of equitable services</b> (A.11 – A.12)	\$

**PR3099 – PNP Compliance Report, Part 2** (selected sections) –  
**Equitable Services Calculations, Title IV, Part A**



**Part 2 – Equitable Services Calculations**

- Title I, Part A
- Title I, Part C
- Title II, Part A
- Title III, Part A - EL
- Title III, Part A - Imm
- **Title IV, Part A**

F. Equitable Services Calculation for Title IV, Part A SSAEP	
Description	Calculation
1. Total student enrollment in LEA	
2. Total student enrollment in participating private schools	
3. Total enrollment (F.1 + F.2)	
4. Total current year Title IV, Part A allocation	\$
5. Transfer in from Title II, Part A	\$
6. Transfer out from Title IV, Part A	\$
7. Total allocation and transfer amount(s) (F.4 + F.5 – F.6)	\$
8. LEA reservation for direct administration (not to exceed 2% of F.7)	\$
9. LEA amount to calculate Private Schools Equitable Services (F.7 – F.8)	\$
10. LEA Per-Pupil Allocation (F.9 / F.3)	\$
11. <b>Calculated Private School Reservation (F.2 X F.10)</b>	\$

# Program Compliance Self-Check Guide

2025-2026

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10/2 (December 2025)

### Program Compliance Self-Check Guide

This document is intended to assist LEAs in completing the Program Compliance Self-Check sections of the ESSA Consolidated Compliance Report. It can also be used as a guide to LEAs as they determine what documentation to retain as they implement their programs.

Documenting overall compliance for a program requirement may require several forms of documentation to be maintained locally and available upon request by TEA and/or an auditor.

The compliance items listed are a selection of program compliance requirements for compliance reporting purposes and not an all-inclusive listing of all the requirements for a particular program. For a complete listing of all the program compliance requirements, please see the [Program-Specific and ESSA Provisions and Assurances](#). Additional guidance concerning program requirements can be found in the respective [Program Guides](#).

For questions or additional information, please contact us at [ESSASupport@tea.texas.gov](mailto:ESSASupport@tea.texas.gov).

**FPC ESSA Consolidated Program Compliance Resources:**  
<https://tea.texas.gov/finance-and-grants/grants/essa-program/federal-program-compliance>

**Program Compliance Self-Check Guide – 2025-2026 and Beyond [v.8.1 (12/2025)]:**  
<https://tea.texas.gov/finance-and-grants/grants/essa-program/programcomplianceselfcheckguide2025.pdf>

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## PR3099 – PNP Compliance Report Program Compliance Self-Check Items



- Documenting overall compliance for a program requirement may require several forms of documentation to be maintained locally and available upon request by TEA and/or an auditor.
- The compliance items listed are a selection of program compliance requirements for compliance reporting purposes and not an all-inclusive listing of all the requirements for a particular program. For a complete listing of all the program compliance requirements, please see the current year's *ESSA Program-Specific and ESSA Provision Assurances*. Additional guidance concerning program requirements can be found in the PNP Program Guide.

## PR3099 PNP School Equitable Services, Compliance Report - Program Compliance Self-Check Items



The following PNP compliance items were selected for inclusion in the ESSA Consolidated Compliance Report – PR3099:

### Part 3: Program Compliance Self-Check

1. Timely and Meaningful Consultation Meetings and Affirmations of Consultation
2. Inventory Control of Purchases for PNP Equitable Services
3. PNP Equitable Services Amounts, including Amounts Reserved for Administration

## Program Compliance Self-Check – PNP Selected Requirements (2025-2026) – *Timely & Meaningful Consultation*



Program Compliance Self-Check Guide  
PNP Equitable Services

### PNP Equitable Services

#### Timely and Meaningful Consultation

**Compliance Item 1:**

The LEA conducted timely and meaningful consultation with participating PNP school officials regarding the implementation of the ESSA programs according to ESSA Sections 1117 and/or 8501, as appropriate.

The consultation occurred before the LEA made any decisions that affect the opportunities of eligible PNP school children, teachers, and other educational personnel to participate in the program, and continue throughout the implementation and assessment of program activities.  
[Section 1117(b)(1)(A), Sections 8501(A)(3) and 8501(A)(5)]

**Strongest Documentation Recommended:**

- agendas
- meeting minutes
- emails and/or
- other documentation of timely and ongoing consultation

The LEA may have other documentation that potentially might show compliance. In the event of an audit, TEA or audit staff would make the final determination concerning whether the documentation is sufficient to demonstrate compliance with the program requirement.



Program Compliance Self-Check Guide - 2025-2026 and Beyond [v.8.1 (12/2025)]:

<https://tea.texas.gov/finance-and-grants/grants/essa-program/programcomplianceselfcheckguide2025.pdf>

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## Program Compliance Self-Check – PNP Selected Requirements (2025-2026) – *Inventory Control*



### LEA Maintained Control of PNP Inventory

#### Compliance Item 2:

LEA procedures were in place ensuring it maintained control of PNP technology, equipment, and supplies purchased for the equitable services program(s). [Sections 1117(d)(1) and 8501(d)(1)]

#### Strongest Documentation Recommended:

- LEA procedures that ensured it maintained control of technology, equipment, and supplies purchased for the PNP equitable services program(s); **and**
- Copy of written policies and procedures regarding purchases of PNP technology, equipment, and supplies for equitable services; **and**
- One (1) sample of dated agendas, consultation notes, and/or other documentation specifying LEA maintains control of PNP purchase(s) for equitable services; **and**
- Inventory list of items purchased for PNP equitable services on one (1) participating private school campus for each participating ESSA program (i.e., supplemental property/equipment, materials, supplies, and devices such as laptops, 3-D printer, science/lab equipment, etc.,).

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V 8.1 (December 2025)



Program Compliance Self-Check Guide - 2025-2026 and Beyond [v.8.1 (12/2025)]:

<https://tea.texas.gov/finance-and-grants/grants/essa-program/programcomplianceselfcheckguide2025.pdf>

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## Program Compliance Self-Check – PNP Selected Requirements (2025-2026) – *Equitable Services Amounts*



### Equitable Services Amounts

#### Compliance Item 3:

The LEA documented the equitable services amounts used and provided a detailed explanation of the equitable services amounts provided to PNP officials for all applicable participating programs. [Section 1117(a)(4) and Section 8501(a)(4)]

#### Strongest Documentation Recommended:

- Documentation LEA informed PNP officials of fiscal requirements that include equitable services amounts for one (1) private school campus
  - (i.e., agenda, meeting minutes, LEA program summaries, timeline of professional development travel and PNP purchase requests, calendar of program services with equitable services amounts, or other documentation meeting requirement); **or**
- Documentation LEA shared calculated equitable services amounts by program for one (1) PNP school campus
  - (i.e., LEA calculations by PNP campus and program level, calculation formulas per PNP campus, etc.); **or**
- Written procedures and documentation that provided verification/tracked LEA PNP inventory purchases that include equitable services amounts for one (1) private school campus.

The LEA may have other documentation that potentially might show compliance. In the event of an audit, TEA or audit staff would make the final determination concerning whether the documentation is sufficient to demonstrate compliance with the program requirement.



Program Compliance Self-Check Guide - 2025-2026 and Beyond [v.8.1 (12/2025)]:

<https://tea.texas.gov/finance-and-grants/grants/essa-program/programcomplianceselfcheckguide2025.pdf>

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## Program Compliance Self-Check – PNP Selected Requirements (2025-2026) – *Equitable Services Administration Amounts*



### Equitable Services Administration Amounts

#### Compliance Item 4:

The LEA documented the equitable services *administration* amount used and provided a written explanation to all applicable participating programs.

#### Strongest Documentation Recommended:

- Documentation LEA informed PNP officials during consultation(s) of equitable services *administration* amount (if applicable) and how it was used
  - (i.e., amount/percentage of PNP funds appropriated, agenda, meeting minutes, third-party/Shared Services Agreement, calculated campus spreadsheet(s) indicating administration amounts, etc.).

The LEA may have other documentation that potentially might show compliance. In the event of an audit, TEA or audit staff would make the final determination concerning whether the documentation is sufficient to demonstrate compliance with the program requirement.

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Program Compliance Self-Check Guide - 2025-2026 and Beyond [v.8.1 (12/2025)]:

<https://tea.texas.gov/finance-and-grants/grants/essa-program/programcomplianceselfcheckguide2025.pdf>

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**Reporting on Self-Check Items**

**TEA**  
Texas Education Agency

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**What happens when LEA reports on Program Self-Check program requirements?**

Version 3.0 6/25

**FPC Training Slides (2024-2025):**  
<https://tea.texas.gov/sites/default/files/essacompliancereportnotincompliance.pdf>

## Compliance Report Self-Check Items – ‘In Compliance’



### What is meant by “In Compliance”?

- School System has the strongest documentation recommended, readily available as evidence that the requirement was met in the current reporting year.
- The School System may have other documentation that potentially might show compliance.
- In the event of an audit, TEA or audit staff would make the final determination concerning whether the documentation is sufficient to demonstrate compliance with the program requirement.

	School Assures	Fiscal Agent Assures
<b>In Compliance</b>	<ul style="list-style-type: none"> <li>• School System assures that it has documentation showing compliance readily available upon request.</li> </ul> OR <ul style="list-style-type: none"> <li>• School System may have other documentation that potentially might show compliance. In the event of an audit, TEA or audit staff would make the final determination concerning whether the documentation is sufficient to demonstrate compliance with the program requirement.</li> </ul>	<ul style="list-style-type: none"> <li>• Fiscal agent assures that it has documentation for all <b>SSA members</b> showing compliance readily available upon request.</li> </ul> OR <ul style="list-style-type: none"> <li>• Fiscal agent may have other documentation that potentially might show compliance. In the event of an audit, TEA or audit staff would make the final determination concerning whether the documentation is sufficient to demonstrate compliance with the program requirement.</li> </ul>

## Compliance Report Self-Check Items – ‘Not In Compliance’ and ‘Not Applicable’

What is meant by “Not In Compliance”?		
	<ul style="list-style-type: none"> <li>School System does not have the strongest documentation recommended readily available as evidence that the requirement was met in the current reporting year.</li> <li>School System describes the plan to meet compliance the following year.</li> </ul>	
	School System Assures	Fiscal Agent Assures
<b>Not In Compliance</b>	<ul style="list-style-type: none"> <li>School System assures they are out of compliance and provides a plan to meet compliance the following year.</li> </ul>	<ul style="list-style-type: none"> <li>Fiscal agent assures <b>that one or more SSA member</b> are out of compliance and provides a plan to meet compliance the following year.</li> </ul> <p style="margin: 0;">AND</p> <ul style="list-style-type: none"> <li>Fiscal agent provides the list of SSA member(s) that are out of compliance.</li> </ul>
What is meant by “Not Applicable”?		
Only displays on report when a requirement may have a circumstance that is not applicable The reason(s) for “Not Applicable” are provided in the text of the item		
	School System Assures	Fiscal Agent Assures
<b>Not Applicable</b>	<ul style="list-style-type: none"> <li>School System assures that only the listed reason(s) apply. No other reason is acceptable.</li> </ul>	<ul style="list-style-type: none"> <li>Fiscal agent assures that only the listed reason(s) apply. No other reason is acceptable.</li> </ul>

# PNP School Equitable Services: *Draft* Program Monitoring Validations (PMV) Protocol



## Draft - PMV PNP Equitable Services Protocol Purpose



DRAFT

### **Private Nonprofit School (PNP) Equitable Services Program Monitoring Validations Protocol**

The Federal Program Compliance Division administers an annual program monitoring validations (PMV) process for ensuring that School Systems comply with the requirements of the Private Nonprofit School (PNP) Equitable Services program.

School systems can use this document as a guide to ensure compliance with the following statutory requirements.

Requirements Referenced in this Protocol:

- [Inventory Control of Purchases for PNP Equitable Services](#)
- [PNP Equitable Services Amounts, including Amounts Reserved for Administration](#)
- [Timely and Meaningful Consultation Meetings and Affirmations of Consultation](#)

## Draft - Documentation Requested



DRAFT

### Documentation Requested

Documenting overall compliance with a program requirement may require several forms of documentation to be maintained locally and available upon request by TEA and/or an auditor. To ensure overall compliance with program requirements, school systems should refer to the [ESSA Private Nonprofit School Equitable Services Program Guide](#) and the most current version of the Program Compliance Self-Check Guide ([ESSA Consolidated Compliance Reports Resources](#)), which refer to the multiple forms of documentation required to be maintained locally. The documentation requested for submission during the validation process may not include all forms of documentation required to be maintained locally.

As part of the program monitoring validation process, school systems will be requested to include the selected documentation referenced in the tables below to demonstrate compliance with the program requirements described. TEA will utilize the following tables during the review of documentation to determine if the school system submitted sufficient documentation to support school system compliance.

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## Draft – PNP PMV Protocol, Requirement & ESSA Citation – (selected sections) *Inventory Control of Purchases*



DRAFT

### Requirement & ESSA Citation: Inventory Control of Purchases for PNP Equitable Services [Sections 1117(d)(1), 8501(d)(1), and CFR Title 34, Section 76.661(a)(d)]

#### Statutory Requirement References

The requirement is referenced in the following documents.

#### Every Student Succeeds Act (ESSA) Citation & Statute Language

##### Title I, Part A Program: Section 1117(d)(1)

- The control of funds provided under this part, and title to materials, equipment, and property purchased with such funds, shall be in a public agency, and a public agency shall administer such funds, materials, equipment, and property.

##### Title VIII Programs (Titles IC, IIA, IIIA, IVA, IVB): Section 8501(d)(1)

- The control of funds used to provide services under this section, and title to materials, equipment, and property purchased with those funds, shall be in a public agency for the uses and purposes provided in this Act, and a public agency shall administer the funds and property.

- Code of Federal Regulations (C.F.R.), Title 34, Section 76.661(a)(d)  
An agency, consortium, or entity must keep title to, and exercise continuing administrative control of, all property, equipment, and supplies that the agency, consortium, or entity acquires with funds under a program listed in §299.6(b) for the benefit of eligible private school children and their teachers and other educational personnel.

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**Draft –PNP PMV Protocol** (selected sections) –  
**Provisions & Assurances, Inventory Control**



DRAFT

**TEA ESSA Program-Specific Provisions & Assurances**

**Assurances Relating to Title I, Part A**

The control of Title I, Part A, funds and title to materials, equipment, and property purchased with such funds shall be in a public agency, and a public agency shall administer such funds, materials, equipment, and property.

**Assurances Relating to Title VIII Programs**

Title I, Part C, Migrant; Title II, Part A; Title III, Part A, English Learner; Title III, Part A-Immigrant; Title IV, Part A

The LEA will comply with the uniform provisions for providing services to private schools as specified in Title VIII, Part F, Subpart 1, Private Schools, Sections 8501-8504.

**Draft –PNP PMV Protocol** (selected sections) – **Compliance**  
**Report Program Self-Check Item – *Inventory Control***



DRAFT

**TEA Compliance Report Program Compliance Self-Check Item**

The school system procedures were in place, ensuring it maintained control of PNP technology, equipment, and supplies purchased for the equitable services program(s).

**Draft –PNP PMV Protocol** (selected sections) -  
**Documentation Requested, *Inventory Control***



DRAFT

**Documentation Requested**

Self-Assessment Compliance Questions	Requested Documentation	Year of Documentation Requested
<p>What is the process the school system uses to ensure that materials, technology, equipment, and property purchased with federal funds for use by PNP schools are accounted for?</p> <p>How does the school system ensure that such a process is in accordance with federal statute and regulations for inventory control?</p>	<p><b>1.1 School System Inventory Control Policies and Procedures</b>                      Documentation of the school system’s written inventory policies and procedures for purchases of PNP technology, equipment, and supplies for equitable services.</p>	<p>Immediate prior year</p>
<p>What is the process the school system uses to communicate inventory control requirements to PNP schools as per the school system’s written policies and procedures?</p>	<p><b>1.2 School System Evidence of Inventory Control Consultation</b>                      One (1) sample of dated agendas, consultation notes, or other auditable documentation specifying the school system maintained control of PNP purchase(s) for equitable services.</p>	<p>Immediate prior year</p>
<p>How does the school system ensure that the inventory listing for materials, technology, equipment, and property purchased with federal funds for use by PNP schools is maintained in accordance with federal statute and regulations and updated on an ongoing basis?</p>	<p><b>1.3 School System Evidence of Inventory Control - List</b>                      Documentation of the school system’s inventory list of items purchased for PNP equitable services on one (1) private school campus for each participating ESSA program (i.e., supplemental property/equipment, materials, supplies, and devices such as laptops, 3-D printer, science/lab equipment, etc.).</p>	<p>Immediate prior year</p>

## Draft –PNP PMV Protocol - Resources



DRAFT

### Resources

Each regional Education Service Center (ESC) is required to offer and provide technical assistance related to the program monitoring validation process. Please consult with ESC staff if there are questions or if additional information is needed. Regional ESC Federal Program staff information can be located at: <https://tea.texas.gov/finance-and-grants/grants/essa-program/title-i-part-a-improving-basic-programs>. The following resources are also available:

- [Federal Program Compliance Program Monitoring Validations Process Resources](#)

[Federal Program Compliance Program Monitoring Validations Process Resources](#)


## Table Share – PNP PMV Protocol Document



- Small Group Reviews: PNP PMV Protocol document
- Share Out



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**Common PNP PMV Pitfalls:**

- Timely & Meaningful Consultation**
- Affirmations of Consultation**
- LEA Inventory Control**

## PNP Timely & Meaningful Consultation – PMV Issues



- Inadequate evidence of written documentation - agendas and consultation meetings
- Lack of evidence in conducting outreach to new PNP schools for consultation
- LEA emails considered 'consultation meetings' for PNP schools participating in Title II, Part A, equitable services vs. *any* onsite/virtual meetings



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## PR3099 PNP Compliance Report – Alignment Check



### Data on PR3099 must match the submitted PNP

#### Affirmations Smartsheet WorkApp data:

- Total number of participating PNP schools
- Total number of programs in which PNP schools participated
- Total number of **signed** and submitted PNP Affirmations for participating schools

If there is a mismatch in data, the LEA must submit an FPC Help Desk Form and request revisions to ensure PNP Affirmations Smartsheet WorkApp data is aligned with the PR3099 data.



## PNP Affirmations of Consultation



- PNP Affirmation of Consultation forms
  - Misalignment with PR3099 Compliance Report data
  - Affirmation WorkApp data revisions not submitted by May 1 or June 2
  - Submission of non-participating PNP schools

## Timely and Meaningful Consultation – LEA Examples



### **Documentation Required:**

- Written documentation supporting timely and meaningful consultation meetings.



### **Best Documented:**

- Dates of consultation meetings
- In-person meetings
- Virtual meetings
- Written phone and email logs
- Written one-pagers, handbooks, etc., with consultation topics
- Signatures and/or follow-up emails on the agreement of topics discussed

## Inventory of Control – PMV Issues



- No evidence of Inventory Policies and Procedures for PNP schools
- No or incomplete LEA Inventory of Control documentation for equitable services
- LEA gives the responsibility of ordering, creating invoices, and tracking inventory purchases to PNP school officials
- LEA has PNP school officials to self-report and document the location(s) and conditions of inventory purchases paid with equitable services
- LEA does not verify the condition or the continued availability of inventory items at the PNP school(s)

# Table Talks: Inventory Control Reviews



**TEA**  
Texas Education Agency

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The illustration depicts a person in a blue uniform standing next to a large digital tablet. The tablet screen displays the text 'INVENTORY CONTROL' at the top, followed by several horizontal lines representing data entries, each with a blue checkmark to its right. At the bottom of the screen is a bar chart with five vertical bars of increasing height. To the left of the tablet, there is a stack of brown cardboard boxes of varying heights. Behind the boxes are several blue gears of different sizes, and a magnifying glass icon is positioned above them. A small green plant in a pot sits on the ground in front of the boxes. The entire scene is set against a light blue background with faint circular patterns.

## Inventory Control – Examples




### **Documentation Required:**

- LEA Inventory Control Policies and Procedures.
- LEA Evidence of Inventory Control Consultation.
- LEA Evidence of Inventory Control.

### **Best Documented:**

- Dated documentation
- In-person consultation
- Written one-pagers, handbooks, agendas, responsibilities, etc., of the LEA Inventory Policies and Procedures
- Listed LEA requirements – responsibility, keep logs, tags items, # inventory checks per year
- Listed PNP requirements – supply/material requests, due date of requests, and monthly checks

## PNP Equitable Services Amounts/Admin Amounts



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## PR3099 PNP Compliance Report – Part 2

### Requirement 3: PNP Equitable Services Amounts/Admin



#### **Documentation Required:**

LEA written explanation of PNP  
Equitable Services Amounts

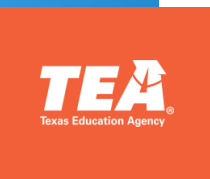


#### **Best Documented:**

- Documentation of discussion
- Dates of consultation meetings on equitable service amounts
- Detailed budget of equitable services
- Written equitable services amounts per PNP campus
- Written documentation of how equitable services can be used per program
- Discussion and documentation of any third-party contractor administration costs
- Documented discussion of potential carryover equitable services

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# From Blueprints to Compliance



## From Blueprints to Compliance: Daily Tools



### ▪ Ready-to-use walkthrough tools and resources

- TEA PNP Program Guide
- TEA PNP Frequently Asked Questions
- TEA Program Compliance Self-Check Guide
- TEA PNP Program Monitoring Validations (PMV) Protocol (*draft*)
- Regions 14 and 16 ESC Title I, Part A, Capacity Building Initiative/PFE Tools & Resources
- *Ready-to-use tools and resources can assist new staff in following the 'blueprint' and understanding how PNP compliance is met*

### ▪ Examples that convert guidance into day-to-day evidence for schools

- Routine and documented consultation meetings throughout the year
- Agenda including topics such as: PNP school equitable services programs, activities, student data, staff PD needs, PNP campus updates, and priorities
- Sign-in sheets/documentation for consultation meetings (onsite & virtual)
- Documented consultation meeting notes
- Follow-up correspondence to PNP school officials: i.e., inventory policies/procedures, PNP PD request procedures and deadlines, equitable services/student needs, Affirmations of Consultation, equitable services administration costs, third-party contracts/documentation/oversight, etc.

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## From Blueprints to Compliance: Red Flags



### ▪ Red flag indicators\*

- Did not attend TEA training sessions or review TEA PMV materials and videos
- Did not attend ESC training sessions or review documents with staff
- Consultation and documentation that doesn't include the PNP equitable services requirements
- Not providing timely and meaningful consultation and/or listening to PNP needs and requests
- Not ensuring multiple educationally-related criteria have been defined for PNP students receiving Title equitable services

\*Can be identified **during a self-check before** submitting PMV requests



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## From Blueprints to Compliance: Self-Permit Review and Closing



### ▪ Self-Permit Review

- Pause and reflect on PMV documentation before submission
  - Has there been a review of all the TEA PMV materials and videos?
  - Are all documents being submitted for the year requested?
  - Are all documents labeled by date and program?
  - Are all documents aligned with the specific PMV requirement?
  - Has there been a connection with the ESC program staff to review all PMV documents before submission?

### ▪ Closing inspection that certifies your next steps are code-compliant

- LEA has submitted revised PNP Affirmation of Consultation forms by the PNP campus, if applicable
- LEA has documented timely and ongoing consultation meetings via agendas and meeting notes
- LEA has conducted onsite visit(s) to review inventory and update records
- LEA has documented public oversight of PNP staff providing services, if applicable, and consulted regarding all equitable services
- LEA has documented and shared each PNP campus's equitable services per participating program



**ESSA PNP State Ombudsman**

## ESSA PNP State Ombudsman Responsibilities



- Provide technical expertise in interpreting, understanding, and implementing accountability requirements for equitable services
- Provide equitable services guidance to Education Service Centers, Local Educational Agencies, Consultants, and Private Nonprofit schools
- Address informal and formal complaints regarding consultation and/or equitable services
- Ensure all equitable services reporting requirements are met
- Develop LEA PNP equitable services program monitoring validation protocols
- Collaborate with TEA Federal Fiscal Monitoring Staff

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## ESSA PNP State Ombudsman Support



- Participate in Title I, Part A, Committee of Practitioners meetings
- Consult with various PNP organizations (selected few)
  - Texas Private School Accreditation Commission (TEPSAC)
  - Texas Private Schools Association (TPSA)
  - International Christian Accrediting Association (ICAA)
- Oversee the State's PNP monitoring process and procedures



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## ESSA PNP State Ombudsman Support – Complaint Process



- Requires formal submission
- Private schools must document efforts used before filing an official complaint
- Must include supporting documentation
  - i.e., correspondence with the LEA
- PNP Complaint reviewed by Ombudsman
- Final Ombudsman decision within 45 days



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**Upcoming Training Sessions**

## Training Opportunities



### 2026-27 ESSA Consolidated Application Statewide Virtual Training

**May 27, 2026**

9:00 a.m. – 3:30 p.m. CST





# Resources and Support

## FPC WorkApp Help Forms – Formula Grants



Screenshot of the Form Link in the WorkApp environment:

 FPC General Help Form



FPC WorkApp General Help Form: <https://app.smartsheet.com/b/form/1b6692e7ac864fc682e8855d7d293fe9>

If School System or ESC staff are experiencing issues with the *EDGAR Connect WorkApp*, complete the help form available in the EDGAR Connect WorkApp for assistance.

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## WorkApp Technical Assistance



- [FPC Division General Smartsheet TEA WorkApp Training Video \(Dec. 2024\)](#)
- [Access TEA Smartsheet WorkApp System](#)
- [FPC General WorkApp Help Form](#)
- [General Smartsheet WorkApp Support & Passwords \(Smartsheet Product Team\)](#)

# ESSA Private School Equitable Services - Webpage

**ESSA Private School Equitable Services**

This page describes TEA plans for compliance with equitable private nonprofit school (PNP) services requirements under the Every Student Succeeds Act (ESSA).

**COVID-19 and Federal Grant Funds**

Visit the Department of Grant Compliance and Administration for information on the federal grants authorized in response to COVID-19.

**ESSA Equitable Services**

**Private Nonprofit Equitable Services Reservations**

This reports table provide the amount of funds that must be reserved to allow for equitable services to eligible students at participating private nonprofit schools.

For Title I, Part A, the private nonprofit (PNP) equitable services reservation amount does not include any funds for the school district administration of private nonprofit services. School districts are required to consult with PNP prior to allocating administrative costs from the equitable services amount.

**TEA Resources**

- Guidance on Priority Factors Private School Children and Disabilities
- Statewide Training Series
- Department of Grant Compliance and Administration
- Private Program Compliance Act (ESSA) Status
- Every Student Succeeds Act (ESSA) Status
- ESSA EdFiler
- ESSA Program Monitoring Notifications
- ESSA State Plan
- ESSA Unique School Choice Option
- Recommended Use of ESSA Funds - TEA Strategic Priorities
- Subpart 1, Test Support Handbook

## ESSA Equitable Services Documents

TEA has developed the following forms for districts to use in complying with the ESSA equitable services requirement.

### Affirmation of Consultation with PNP School Officials

In accordance with the requirements of ESSA, districts and eligible PNPs must collaborate to complete the following Affirmation of Consultation forms, as applicable, and submit them to TEA. Instructions for completing and submitting the forms are also linked below, in addition to the sections of ESSA that specify the PNP consultation requirements.

For 2025-2026:

- Instructions for Affirmation of Consultation (coming soon)
- Video related to Instructions for Affirmation of Consultation (coming soon)
- Affirmation of Consultation with PNP Officials: Formula Grants

For 2024-2025:

- Instructions for Affirmation of Consultation
- Video related to Instructions for Affirmation of Consultation
- Affirmation of Consultation with PNP Officials: Formula Grants

<https://tea.texas.gov/finance-and-grants/grants/essa-program/essa-private-school-equitable-services>

## PNP Equitable Services and Title IV, Part B (21<sup>st</sup> CCLC)



### Federal Program Compliance Division

[PNPOmbudsman@tea.texas.gov](mailto:PNPOmbudsman@tea.texas.gov)

#### 21<sup>st</sup> Century Community Learning Centers (CCLC) and Private Nonprofit (PNP) Equitable Services Frequently Asked Questions

This document provides the answers to program-related questions received by the Division. You can also navigate through the document using the Bookmarks in your PDF viewer.  
For questions or additional PNP information, contact [PNPOmbudsman@tea.texas.gov](mailto:PNPOmbudsman@tea.texas.gov).  
For questions or additional Title IV, Part B, 21<sup>st</sup> CCLC information, visit <https://tea.texas.gov/21cclc>.

#### 1. What is the purpose of the Title IV, Part B, 21<sup>st</sup> Century Community Learning Centers (CCLC) [Texas After-school Centers on Education (ACE)] program?

The purpose of the Title IV, Part B, 21<sup>st</sup> Century Community Learning Centers (CCLC) program authorized in Texas as Texas ACE, is to provide opportunities for children to establish or expand activities in community learning centers that:

- Offer opportunities for academic enrichment to help children, particularly children who attend low-performing schools, meet challenging State academic standards;
- Offer children a broad array of additional services, programs, and activities that are designed to reinforce and complement the regular academic program of participating children; and
- Offer families of children served by community learning centers opportunities for active and meaningful engagement in their children's education.

#### 2. Must an eligible entity target services to certain children for 21<sup>st</sup> CCLC services?

Yes. To receive a 21<sup>st</sup> CCLC subgrant, an eligible entity must assure that the program will target children who primarily attend public schools eligible to operate a schoolwide program under section 1114 of the ESIA—i.e., a school with a poverty percentage of 40 percent or more. (ESIA section 4203(b)(2)(F)). Also, an SEA must give priority in its competitive process to applications proposing to target children who primarily attend public schools that are implementing comprehensive or targeted support and improvement activities under section 1111 of the ESIA, other schools determined by a School System to need intervention and support, and schools that enroll children who may be at risk for academic failure, dropping out of school, involved in criminal or delinquent activities, or who lack strong positive role models. (ESIA sections 4203(a)(3)(A), 4204)(1)(A)). There is no requirement that a 21<sup>st</sup> CCLC program exclusively serve these children, however, and a

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<https://tea.texas.gov/texas-schools/support-for-at-risk-schools-and-students/texas-ace>

<https://tea.texas.gov/finance-and-grants/grants/essa-program/21cclc-pnp-faq.pdf>

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# PNP Equitable Services Frequently Asked Questions (FAQs) (September 2025)



**TEA Federal Program Compliance Division**  
 PNP Ombudsman@tea.texas.gov

**ESSA Private Nonprofit (PNP) Frequently Asked Questions**

This document provides the answers to program-related questions received by the Division. You can also navigate through the document using the bookmarks in your PDF viewer. The newest topic areas and questions that have been added will be noted by \*\*\* and in blue font.

For questions or additional information, please contact us at [PNPOmbudsman@TEA.Texas.gov](mailto:PNPOmbudsman@TEA.Texas.gov) or [ESSASupport@TEA.Texas.gov](mailto:ESSASupport@TEA.Texas.gov).

The **Supplement, Not Supplant requirement**, ESSA Section 1116, requires that federal program funds be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under the program. For additional guidance related to the Supplement, Not Supplant requirement, refer to the [Supplement, Not Supplant Handbook](#).

School system PNP equitable services, federal statute and guidance, program requirements, resources, and tools are available on the [TEA ESSA PNP Equitable Services](#) webpage.

**\*Questions and responses are organized by the following topic areas:**

- [Eligibility for Equitable Services](#)
- [Calculating Allocations for ESSA Equitable Services](#)
- [Trends and Municipal Considerations](#)
- [Supplement, Not Supplant](#)
- [Coverage of Equitable Services](#)
- [LEA Pooling of Title VIII Funds for Equitable Services](#)
- [Technology](#)
- [SEAF and Transparency](#)
- [Title I, Part A, Equitable Services](#)
- [Title I, Part C, Migrant Equitable Services](#)
- [Title II, Part A, Equitable Services](#)
- [Title II, Part A, Equitable Services](#)
- [Title IV, Part A, Equitable Services](#)
- [Title IV, Part B, Equitable Services](#)
- [Staff Expanding PNP Equitable Services](#)
- [Travel and Professional Development](#)
- [Evaluations for Equitable Services](#)
- [Virtual Meetings](#)
- [Shared Services Arrangement \(SSA\) and Equitable Services\\*](#)
- [PNP Affirmation SmartSheet WorkApp\\*](#)
- [Signposts Self-Communities Act \(SSCA\) Stronger Connections Grant \(SCG\) and Title IV Equitable Services\\*](#)

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**Q7: What happens if a PNP equitable service purchase is deemed unallowable during a TEA random validation and/or audit? Does the PNP pay it back, or is the school system responsible for that unallowable cost?**

**A7:** The school system would be responsible for unallowable costs since it maintains public control and responsibility for ensuring the allowability of all equitable services expenditures under the program.

**\*Q8: How are Title VIII programs' administrative costs and other costs of providing services to public and private school children determined?**

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Private Nonprofit (PNP) Equitable Services FAQ Document

**\*AB:** A school system reserves funds for administrative costs, including indirect costs, from a program's total allocation (off the top) before the LEA determines the allocation for services and benefits for public and private school children and educators [34 C.F.R. section 299.7(a)(2)]. In some cases, the statute for a covered ESSA program specifies the maximum percentage of a program's total allocation that a school system may use for administrative costs. All costs must be necessary, reasonable, and allocable to the program.

A contract to provide equitable services may include reasonable and necessary costs associated with providing services. These costs would not be included in the school system's reservation of funds to administer the covered ESSA program. Rather, such costs would be built into the contract – i.e., as program service costs. - Title VII, Part F, of the ESSA of 1965, as amended by the ESSA: Equitable Services for Eligible Private School Children, Teachers, and Other Educational Personnel Non-Regulatory Guidance (July 17, 2023).

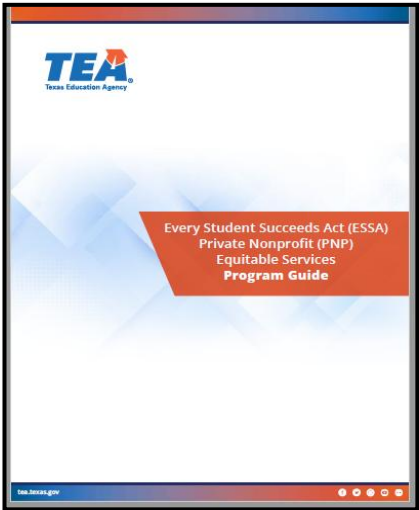
**\*Q9: What are administrative costs?**

**\*A9:** Administrative costs are costs incurred to support the functioning of a grant program or grant-funded activity, but which may not be directly related to the grant. Administrative costs include both direct and indirect administrative costs. Examples of costs that may be considered administrative are salaries and benefits of secretarial staff, salaries and benefits of staff who supervise activities of program staff, accounting and fiscal responsibilities, reporting, evaluation, monitoring, and auditing. Please refer to the [TEA General and Fiscal Guidelines](#) for more information on administrative costs.

<https://tea.texas.gov/sites/default/files/PNPFAQ.pdf>

TEA

## ESSA PNP Program Guide



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[TEA ESSA PNP Program Guide](https://tea.texas.gov)

## TEA Resources



- [TEA ESSA Private School Equitable Services](#) (webpage)
- [TEA ESSA Private School Equitable Services FAQs](#)
- [TEA 21st Century Community Learning Centers \(CCLC\) and PNP School Equitable Services FAQs](#) – (**NEW** resource, 12/2025)
- [TEA FPC Program Monitoring Validation](#) (webpage)
- [TEA Federal Fiscal Monitoring](#) (webpage)



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## Resources



- [Region 14 Statewide ESSA Title I, Part A, Capacity Building Initiative - PNP Resources](#) (webpage)
- [ESC 16 - Title I, Part A, Parent and Family Engagement Statewide Initiative](#)
- [ED Office of Nonpublic Education](#)
- [Elementary and Secondary Education Act \(ESEA\) as amended by the Every Student Succeeds Act \(ESSA\) of 2015](#)
  - ESSA, Title I, Section 1117
  - ESSA, Title VIII, Section 8501
- LEA's federal fiscal and/or program coordinator staff

## Education Service Center ESSA Basic Services Initiative



### LEA PNP Equitable Services Training, Technical Assistance, and Guidance

- PNP Equitable Services Requirements for Title I, Part A, and Title VIII Programs
- ESSA Consolidated Grant Application, PS3099 Private School Schedule
- ESSA Consolidated Compliance Report, PR3099 Private School Schedule
- PNP Equitable Services Program Monitoring Validations (PMVs)



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## How can a LEA search for Texas private schools?



- A LEA should use multiple outreach methods (local newspaper ads, local directories, emails, postal mail, posters/signs, etc.) and keep documentation on file.
- The LEA may search on private school and private accrediting agency websites.

***A LEA must ensure that a private school has documentation of nonprofit status and that it meets requirements for eligibility to receive equitable services.***



## PNP Schools' Search (not an exhaustive search list)



- [Great Schools - Texas Private Schools](#)
- [Texas Private School Accreditation Commission \(TEPSAC\)](#)
- [Texas Private Schools Association \(TPSA\)](#)
- [Texas Alliance of Accredited Private Schools \(TAAPS\)](#)
- [USA Texas Schools](#)
- [Cognia Accredited Schools](#)
- [Council for American Private Education \(CAPE\)](#)
- [National Center for Education Statistics \(NCES\)](#)
- [National Council for Private School Accreditation \(NCPSA\)](#)
- [ED School Choice: Education Organizations](#)

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## ESC 16 – Statewide ESSA Title I, Part A, Parent and Family Engagement Capacity Building Initiative



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**TITLE I, PART A**  
**Parent & Family**  
**ENGAGEMENT**  
STATEWIDE INITIATIVE

**TITLE I, PART A**  
**Parent & Family**  
**ENGAGEMENT**  
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*It takes a village.*

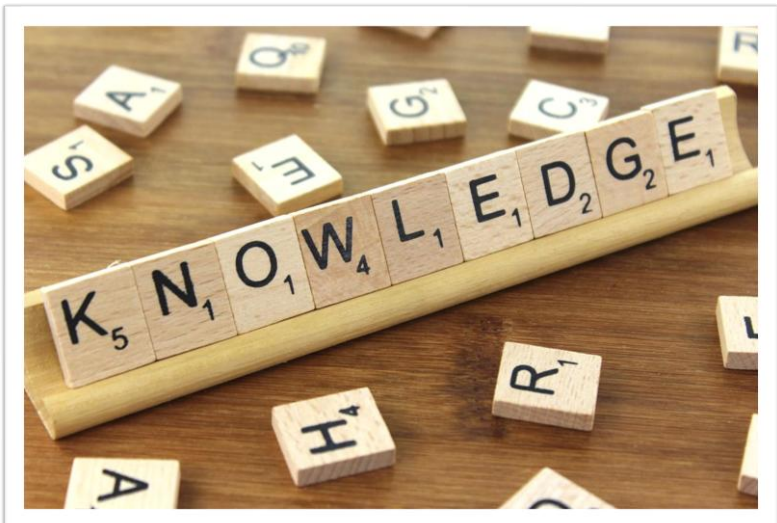
[ESC 16 - Title I, Part A, Parent & Family Engagement Statewide Initiative](#)


## Web Resources – U.S. Department of Education (ED)





- [Title I, Part A, of the ESEA, as Amended by ESSA: Providing Equitable Services to Eligible Private School Children, Teachers, and Families Updated Non-Regulatory Guidance](#) (Updated, May 17, 2023)
- [Title VIII, Part F of ESEA, as Amended by ESSA: Equitable Services for Eligible Private School Children, Teachers, and Other Educational Personnel Non-Regulatory Guidance](#) (Updated, July 17, 2023)
- [ED Office of Non-Public Education \(ONPE\)](#)
- ED Statute - ESSA Title I, Part A, Subpart 1, Section 1117 – Participation of Children Enrolled in Private Schools
- ED Statute - ESSA, Section 8501, Part F, Subpart 1, Participation by Private School Children and Teachers

**What is one new insight or piece of knowledge you learned and/or plan to use moving forward?**





## Presentation Feedback



FPC - Feedback

- Select Event Name: **Statewide -Blueprints to Compliance: Building PNP Equitable Services that Pass Inspection - presented by LaNetra Guess, 5/19/2026**
- Select Program: **Private Nonprofit (PNP)**
- Select a response for the training evaluation statements.
- Provide feedback for the open-ended items.
- Optional: Provide an email address if you would like a staff member to follow up with you regarding any additional feedback you may want to share.

<https://app.smartsheet.com/b/form/e1425a8ae38f4c869627ce01a91ec953>





**TEA**  
**ESSA PNP Equitable Services**  
**Program Contact**




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## TEA Contact Information



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