

Frequently Asked Questions Regarding Nonpublic Schools/Federal Programs

Q1. It has been stated that public funds may not be sent to the nonpublic school district directly from DESE or from the public school district. If this is the case, how will the public school district be allowed to enter into a lease agreement with the nonpublic schools to satisfy the neutral space criteria?

A1. This is an arm's length agreement, an agreement in which the public school receives something of value for the dollars spent. Therefore, the public school district may enter into a lease agreement and make payment to a nonpublic school to comply with the neutral site criteria.

Q2. If nonpublic students receive Title I services at a neutral site during the school day, are these students counted as dual enrolled?

A2. Yes, these students should be counted as students enrolled in the public school during the class period.

Q3. May a teacher who is hired by the nonpublic school provide Title I services to nonpublic school students at a neutral site?

A3. The neutral site criterion states "space shall be under the control of the public school district when services are provided or staff is present." Therefore, the teacher must be a public school employee during the time of instruction. The public school district must have a job description for this teacher.

Q4. May the public school pay for conference or workshop costs for nonpublic teachers?

A4. Yes. However, the conference/workshop must be one of general admission and the content of the conference/workshop must meet the content criteria of the federal program. If any portion of the workshop does not meet the content criteria or is religious in nature, the public school district has the responsibility to pro-rate the workshop fee based on examination of the program content.

Q5. May the public school write a check to a religious organization for conference/workshop fees?

A5. Yes, if the religious organization is serving as a vendor for the conference/workshop and the conference/workshop meets the criteria of the federal program. The public school may only pay for the portion of the conference/workshop that meets the content criteria of the federal program and that is not religious in nature.

Q6. May the public school compensate teachers from private schools for travel expenses for an approved professional development activity?

A6. Yes. However, if the registration fee for this activity has been pro-rated based on content, travel expenses must also be pro-rated.

Q7. May the public school pay for stipends for private school teachers?

A7. Yes. The use of funds for stipends must be reasonable and necessary. For instance, stipends may be needed to compensate teachers for their participation outside their regular employment hours. The stipends must be paid directly to the private school teachers for their own use and not to the private school.

Q8. May the public school pay for substitute teachers to replace teachers from private schools while they attend professional development activities?

A8. No, these funds may not be used to pay for substitute teachers for the private schools.

Q9. May Title II.A funds be used to support the acquisition of advanced degrees by private school teachers?

A9. Yes, a public school district may use Title II.A funds to support a teacher's acquisition of an advanced degree to the extent that doing so is consistent with the results of its assessment of the needs of private school teachers. The financial support must be for graduate courses that would enable the teacher to provide more effective instruction.