


NYS Field Memo
#01 – 2013

Date: February 1, 2013

To: District Superintendents of Schools
New York State Professional Standards and Practices Board for Teaching
New York State Committee of Practitioners
Nonpublic/Private School Administrators
Superintendents of Public Schools

From: Roberto Reyes, Director Title I School & Community Services
Office of Accountability 

Subject: ESEA Title II, Part A – Use of a facilitator center to provide professional development services to nonpublic/private schools

Under ESEA, Title II, Part A, LEAs with nonpublic/private schools within the geographic region of the district must provide equitable services for professional development to those nonpublic/private schools. Many LEAs partner with a third-party entity acting as a facilitator center to provide those services. The following guidance is provided to:

- 1) Any Local Education Agency that has one or more nonpublic/private schools in its geographic region and uses the services of a third-party entity acting as a facilitator center to arrange for the planning and delivery of equitable professional development services to nonpublic/private schools.
- 2) Any agency, organization, or individual operating under contract with one or more LEAs acting as a facilitator center for the purpose in #1.
- 3) Any non-public/private school that is entitled to funds for services through an LEA and uses a third-party entity acting as a facilitator center to access those services.

FREQUENTLY USED TERMS and ACRONYMS

BOCES – Board of Cooperative Education Services

CoSER - COoperative SERvice is a regional educational support program housed at a BOCES in New York State. Services are centralized in order to save money for participating school districts or to allow smaller districts to have services which they might not be able to afford on their own.

EDGAR - Education Department General Administrative Regulations

Equitable Services – Local Education Agencies are required to provide equitable services for private school teachers and other educational personnel only to the extent that the LEA uses Title II, Part A funds for professional development, and services must meet the

requirements of the statute [G-4 USDE Improving Teacher Quality State Grants Non-Regulatory Guidance]

ESEA – Elementary and Secondary Education Act (also referred to as NCLB – No Child Left Behind)

LEA – Local Education Agency is the entity that receives, distributes, tracks, and maintains authority over federal program funds to districts and/or school programs

SEA – State Education Agency is the entity that receives, distributes, tracks, and maintains authority over federal program funds to LEAs

USDE – United States Department of Education

WEB LINKS

USDE Improving Teacher Quality State grants Non-Regulatory Guidance -
<http://www2.ed.gov/programs/teacherqual/guidance.pdf>

USDE Title IX, Part E, Uniform Provisions, Subpart 1-Private Schools Non-Regulatory Guidance –
<http://www2.ed.gov/policy/elsec/guid/equitableseguidance.doc>

ESEA SEC. 9501. PARTICIPATION BY PRIVATE SCHOOL CHILDREN AND TEACHERS -
<http://www2.ed.gov/policy/elsec/leg/esea02/pg111.html#sec9501>

ESEA SEC. 9503. COMPLAINT PROCESS FOR PARTICIPATION OF PRIVATE SCHOOL CHILDREN.
<http://www2.ed.gov/policy/elsec/leg/esea02/pg111.html#sec9503>

EDGAR 34
<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

A. FISCAL RESPONSIBILITY

A-1. – What entity maintains authority over the use of Title II, Part A funds?

The Local Education Agency (LEA) receives a formula grant allocation of ESEA Title II, Part A funds to provide activities allowed within the statute and maintains sole authority over the use and accountability of such funds. Following a consultation process with nonpublic/private school(s) located within the geographic area of the LEA and consultation with a facilitator center, an LEA will make the sole determination of the use and distribution of federal funds in the provision of equitable services. Neither the nonpublic/private school(s) nor the facilitator center(s) maintain any authority over the use of Title II, Part A funds. [G-1 Title IX, Part E, Non-Regulatory Guidance; G23 Improving Teacher Quality State Grants Non-Regulatory Guidance]. Although sole authority as to the use of funds remains with the LEA,

any nonpublic/private school retains the right to file a formal, written complaint [ESEA Sec. 9503].

A.2 - What is the role of the Local Education Agency (LEA) regarding the provision of equitable services to nonpublic/private schools under ESEA Title II, Part A?

To request federal funds from the SEA, an LEA must submit an annual Consolidated Application due to the SEA by August 31 each year. The Consolidated Application includes a Private School Participation Form (PSPF) providing information regarding the agreement between the LEA and nonpublic/private school(s) for equitable services under multiple federal titles. Under Title II, Part A, the LEA is responsible to provide equitable professional development services to nonpublic/private school teachers and other educational personnel and must consult with those schools or their representatives during the design, development, and implementation of the professional development program [Section 9501 Elementary and Secondary Education Act (ESEA)]. Topics for consultation include the needs assessment of the nonpublic/private school teachers and other educational personnel, the determination of services connected to the needs assessment data, how services will be provided, the assessment of those services, how the assessment will serve to improve service, and the size and scope of services provided, including the amount of funds available for services [G-6 Improving Teacher Quality State Grants Non-Regulatory Guidance]. It is advised that each LEA provide ample time for the consultation process to proceed in order to meet the annual Consolidated Application submission date of August 31.

B. ADVANTAGES TO USE OF FACILITATOR CENTER

B.1 - What is a facilitator center?

A facilitator center is an agency, organization, or individual operating under contract with one or more LEAs to coordinate Title II, Part A professional development services for eligible nonpublic/private school teachers and other educational personnel. An LEA, in collaboration with one or more nonpublic/private school(s) within its geographic area, may agree to the use of a third-party entity to conduct all activities necessary to provide equitable professional development services to the nonpublic/private schools; however, the LEA continues to maintain authority and responsibility for the use of Title II, Part A funds [G23 Improving Teacher Quality State Grants Non-Regulatory Guidance].

B.2 - How does a facilitator center operate?

A facilitator center may partner with one or more LEAs and with the non-public/private schools served through those LEAs. Consultation among all parties is required to assure that the needs of the nonpublic/private school teachers and other educational personnel are met in regard to teacher and principal professional development in accordance with requirements in section 9501 of the ESEA. Consultation is also required to assure that each LEA can meet its oversight responsibilities regarding the appropriate use of Title II, Part A funds.

B.3 - What is the advantage of using a facilitator center?

The use of a facilitator center may reduce the time required for LEA personnel to organize the logistics and process the needed documentation associated with providing equitable professional development services to teachers and other educational personnel in

nonpublic/private schools. The use of a facilitator center also may allow multiple nonpublic schools within the same LEA to pool Title II, Part A resources in order to maximize the amount of professional development services provided to private school teachers and educational personnel who work in different schools located in a single LEA. [Note: this “pooled” option is also available to any single LEA that does not use a facilitator center and chooses to act as the coordinating agent of the professional development for nonpublic schools within its own geographic region.]

C. CONTRACTUAL OBLIGATIONS

C.1 - What obligations should be defined in a contract between an LEA and a facilitator center?

Contractual language should represent decisions made as a result of consultation among the LEA, the facilitator center, and the nonpublic/private schools within each LEA that will receive services through the facilitator center. Contract language should comply with appropriate legal and regulatory guidelines.

C.2 - May a Catholic diocese speak on behalf of all the Catholic schools in the diocese and request that the LEA pool funds on behalf of all their Catholic schools within individual LEAs and that their schools be served by a facilitator center?

Yes. Since diocesan Catholic schools are under the aegis of the diocese, the diocese may make decisions concerning services provided through Federal education programs on behalf of the Catholic schools. If the Catholic diocese makes the decision that all Catholic schools in a single LEA will pool funds, the LEA would not need approval from each individual Catholic school principal regarding the diocesan decision. However, there is an expectation that the diocese has discussed this with the Catholic school principals and has informed the respective LEA(s) that the diocese is the primary “private school official” for purposes of consultation and decision-making regarding services provided through Federal education programs. If each Catholic school retains autonomy to make these professional development decisions, the LEA would be required to consult with each Catholic school. Also, the diocese may not speak on behalf of other private schools in an LEA unless those private schools have informed the LEA that the diocese represents them for purposes of securing equitable services.

C.3 - May a facilitator center charge an administrative fee for brokering professional development services under Title II, Part A?

Yes. A facilitator center may charge an administrative fee to each LEA for performing contractual duties; however, the administrative fee must be necessary and reasonable in relation to the services provided. The amount or percentage of the administration fee should be determined in consultation with the LEA and should be represented in the contractual agreement. The payment of any administrative fee must be taken “off the top” of the LEA allocation for Title II, Part A or from LEA local funds but cannot be taken from the amount of Title II, Part A funds generated by private school students for equitable services [G16 Improving Teacher Quality State Grants Non-Regulatory Guidance]. NOTE: LEAs who contract with a facilitator center operated by a BOCES may pay the administrative fee from general funds eligible for CoSer reimbursement.

C.4 – May an LEA pay a facilitator center in full and up front for the total amount of equitable services for private school teachers and other educational personnel in each participating nonpublic/private school?

No. Doing so would be inconsistent with the LEA's responsibility to maintain a contract administration system that ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts. See section 80.36(a)(2) of the Education Department General Administrative Regulations (EDGAR) (34 CFR 80.36(a)(2)). It is unlikely that an LEA would opt to pay up-front for services to be provided at a later time with its non-Federal funds. It may not treat its use of Federal funds differently.

C.5 - When may a facilitator center that is operated through a BOCES invoice each LEA for the provision of equitable professional development services under Title II, Part A?

Federal requirements do not specify any particular time period; however, a facilitator center operated through a BOCES may request a payment cycle outlined in the contract agreement that is amenable to the LEA and the BOCES.

C.6 - When may a facilitator center that is not operated through a BOCES invoice each LEA for the provision of equitable professional development services under Title II, Part A?

Federal requirements do not specify any particular time period; however, a facilitator center that is not operated through a BOCES cannot invoice an LEA for services that have not yet been provided. One practical option a facilitator center might consider is invoicing an LEA on a quarterly basis for professional development services that were provided in the prior quarter on behalf of the nonpublic/private school teachers and other educational personnel aligned with each LEA. An LEA and facilitator center may negotiate a different timeline that is best suited to their needs; however, the agreement should be contractual.

C.7 - When may a facilitator center invoice the LEA for the administrative cost that is permitted by the contract between the two entities incurred for planning, contracts, phone calls, and other administrative duties that take place in advance of the provision of professional development for private school teachers and other personnel?

Each LEA, in consultation with the facilitator center, may decide on a mutually agreed-upon timeline for the disbursement of any necessary and reasonable administrative cost, if applicable. This timeline may be represented in the contractual language.

C.8 - What if the facilitator center has funds left over at the end of the year that were not used for professional development for the nonpublic/private school(s)? What does a facilitator center do with the funds?

Proper invoicing should take place only after services are provided for nonpublic/private schools by facilitator centers that are not operated by a BOCES. Proper procedures eliminate the possibility of leftover funds in the account of the facilitator center. Facilitator centers operated by a BOCES may use a different invoicing system (e.g. monthly) with a contractual agreement that acknowledges that services may not yet have been provided. In both instances, there is a possibility that a fund balance exists at the end of the year, especially when an LEA may have advanced funds to support administrative

fees required for planning. Any end-of-year fund balance in a facilitator center that is not operated by a BOCES must be returned to the LEA where it will be reserved and allocated as Title II, Part A carryover funds for equitable services for the nonpublic/private schools for the next fiscal year. Any end-of-year fund balance in a facilitator center operated by a BOCES may be returned to the LEA or it may be reserved in a dedicated fund that is available to the LEA upon request. This reserved fund, although residing in a BOCES account, still retains the identity of Title II, Part A, carryover funds to provide equitable services for nonpublic/private schools in the following fiscal year.

C.9 – Since the LEA is responsible for the use of Title IIA funds and must be able to document compliance upon request of the SEA or USDE, what information and/or evidence may an LEA request from a facilitator center?

As a condition of receiving its Title II, Part A funds, each LEA must comply with applicable statutory and regulatory requirements, and maintain records to confirm that it has done so [EDGAR 34, Section 76.700 and 76.731; EDGAR; 34 CFR 76.700 and 76.731 <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>]. So that it can meet these responsibilities, each LEA should require evidence of the delivery of allowable Title II, Part A professional development services provided by the facilitator center. As with any activity that the LEA carries out for public school teachers, activities supported with Title II, Part A funds that benefit private school teachers must meet the requirements of the statute. The statute requires: needs assessment, the determination of services connected to needs assessment, how services will be provided, and the size and scope of services provided including the amount of funds available for services. It is the responsibility of the LEA to monitor the appropriate delivery of services to nonpublic/private school teachers and other educational personnel within its boundaries and to negotiate adjustments to those services if necessary.

C.10 – At the beginning of a new school year, if an LEA decides to change the delivery of services, selecting to either use or not use a facilitator center, what are the LEA's obligations to the nonpublic/private schools? Isn't this the decision of the nonpublic/private schools?

The decision-making process rests solely with the LEA; however, before making any decision that will impact the participation of nonpublic/private school teachers and other educational personnel in Title II, Part A programs, the LEA must consult with nonpublic/private school officials or their designated representative(s). Although sole authority as to the use of funds remains with the LEA, any nonpublic/private school retains the right to file a formal, written complaint [Section H, Title IX, Part E, Non-Regulatory Guidance].

D. SERVICE DELIVERY

D.1 - What options are available to a facilitator center for committing Title IIA funds for equitable services on behalf of nonpublic/private school teachers and other education personnel?

In consultation with both the participating LEA(s) and nonpublic/private school official(s), the facilitator center may choose one or both of the following options for

committing the funds reserved for equitable services on behalf of nonpublic/private school teachers and other educational personnel:

1. Individual School-by-School option: Provide equitable professional development services to nonpublic/private school teachers and other educational personnel with funds based on the relative enrollment of a single nonpublic/private school.
2. Pooling Option: Combine Title II, Part A funds allocated for nonpublic/private school teachers and other educational personnel from some or all of the schools within the same LEA to create a pool of funds from which the facilitator center provides equitable professional development services to participating teachers and other educational personnel from multiple schools in that sole LEA. Any facilitator center that pursues this option must, in consultation with each participating LEA and participating nonpublic/private school and/or their representative(s), establish criteria to determine how services will be allocated among the participating nonpublic/private school teachers and other educational personnel in the different schools. Under this option, professional development services provided to the nonpublic/private school teachers and other educational personnel in any particular school are not dependent on the amount of funds generated by students and teachers in that school but by the amount of funds generated in total (for all participating nonpublic schools within that single LEA).

Example: Private School A has a staff of 8 teachers/1 principal (80 students) who are entitled to receive \$540 worth of equitable services for professional development under Title II, Part A (a per pupil allocation of \$6.75). The staff of 30 teachers/1 principal (600 students) in Private School B, located in the same LEA, is entitled to \$4,050 worth of professional development services. Private School C, also located in the same LEA, has a staff of 30 teachers/1 principal (450 students) who are entitled to \$3,037.50 in services. If all three schools choose to participate in a pooled fund arrangement using the facilitator center, the facilitator center now has \$7,627.50 to spend on professional development services for all or any portion of 68 teachers and 3 principals. In consultation with the LEA and all three participating nonpublic/private schools, the facilitator center will administer services to meet the various needs of the school teachers and other educational personnel. Under this option, the services provided to teachers and other educational personnel are not dependent upon the amount of funding generated for services in each school.

NOTE: 1) The facilitator center may not pool funds on behalf of nonpublic/private school teachers and other educational personnel without the express permission of the LEA and consultation with nonpublic/private school officials; 2) it is never allowable to pool funds across LEAs; and 3) it is never allowable to pool funds from multiple ESEA Titles (e.g. combining Title I, Parts A & D and Title II, Part A together.)

D.2 – May a facilitator center pool funds available for professional development for staff of nonpublic/private schools that are located in multiple LEAs?

No. Title II, Part A funds may **not** be pooled across LEAs. This is because the amount of Title II, Part A funds generated for services to private school teachers in an LEA may only be expended for services for those private school teachers in that LEA. However, in the case

of a Catholic Diocese, for example, that would like all teachers (in a number of LEAs) to receive the same professional development in order to meet the teachers' needs, the facilitator center could use Title II, Part A funds to provide the same professional development services for all the Catholic school teachers in their respective LEAs. Such a scheme would have to ensure that funds generated for Title II, Part A services for private school teachers in a particular LEA were expended on services only for the private school teachers in that LEA. One way to facilitate this combined teacher professional development would be through a per-teacher cost. See additional examples using the graphic organizer below.

D.3 - If a nonpublic/private school has teachers or other educational personnel receiving services through the facilitator center "pool," can it remove the school from the pool if the school wants other services for these staff instead of those provided through the pool?

No. Once a nonpublic/private school commits to join a consortium that is pooling Title II, Part A funds available for professional development services for private school teachers or other educational personnel, it must remain within that consortium until the next fiscal year, even if it elects to no longer participate during the current year. Funds remain in the pool to be used for services for the other private school teachers and other educational personnel that were in the original agreement.

D.4 – For FY 2012-13, if an LEA has agreed to use the services of a facilitator center for the purpose of coordinating equitable professional development services for nonpublic schools without having entered into a formal contract, what steps are necessary now?

If an LEA has already agreed to use the services of a facilitator center for the purpose of coordinating equitable professional development services for nonpublic schools during FY 2012-13, the LEA should, as soon as practicable within this fiscal year, enter into an appropriate contractual arrangement.

D.5 – For FY 2012-13, if an LEA has transmitted the full sub-allocation of Title II, Part A funds to a facilitator center for the provision of equitable professional development services to nonpublic schools, what steps are necessary now?

If an LEA has already transmitted the full sub-allocation of Title II, Part A funds to a Facilitator Center for the provision of equitable professional development services to nonpublic schools, the LEA should, as soon as practicable within this fiscal year, enter into a contract that will allow the LEA to fully account for the appropriate expenditures of these funds in FY 2012-13. LEAs that have not transmitted the full sub-allocation should follow the guidance listed in Question C.4 above. LEAs are not permitted to transmit funds for services until those services have been provided with two exceptions: 1) where a facilitator center is operated by a BOCES that is permitted to invoice the LEA on a routine schedule basis referenced in Question C.5 above, and 2) where a facilitator center is permitted to invoice an LEA for the contractually agreed-upon administrative costs referenced in Question C.3 above, subject to year-end accounting of actual costs.

D.6 – May a facilitator center impose a deadline date for LEAs to select the facilitator center as the coordinator of professional development services for nonpublic/private schools within the LEA boundaries?

Yes. However, it is recommended that deadline dates be represented in the contractual agreement between the facilitator center and each LEA.

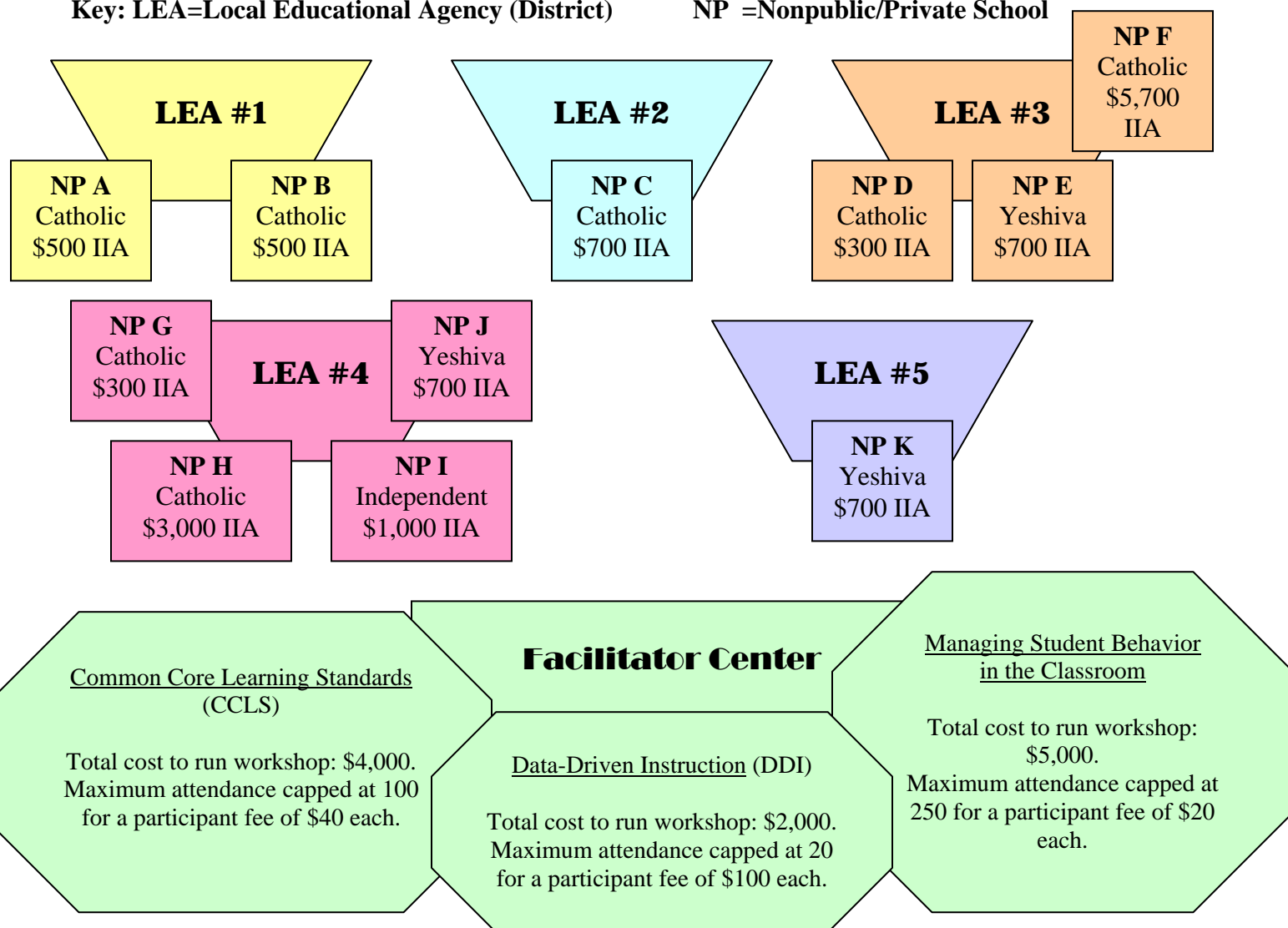
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D.7: Title IIA funds cannot be pooled across LEAs. How does a facilitator center maximize the provision of services to nonpublic/private schools within a large geographic region that includes multiple LEAs?

See the graphic organizer and sample descriptions below.

Key: LEA=Local Educational Agency (District)

NP =Nonpublic/Private School



NOTE: Attendance at one-day or short term workshops or conferences must be determined to be reasonable and necessary to achieve the goals of a needs assessment for continuous improvement in student outcomes and must be part of an ongoing and sustained expectation that new skills will be implemented and sustained over time.

DELIVERY OF PROFESSIONAL DEVELOPMENT WORKSHOPS: There are two possible ways to consider how funds will be used to deliver professional development workshops:

Concept 1) Cost of workshop delivery is dependent upon the cost per participant where only a limited amount of people can attend in order to gain full benefit of the training (e.g. consultant sets a maximum of 50 participants per session);

Concept 2) Cost of workshop delivery is dependent upon the aggregate cost of the training where participation can vary from few to many people with no loss of the full benefit of the training (e.g. workshop can be attended by 5 to 500 and still produce positive outcomes from the training).

Sample Summary Description Using Graphic Organizer Above: A facilitator center partners with five LEAs on behalf of eleven private schools, seven of which are Catholic schools run by the Diocese of South City. In consultation with the Diocese and all five LEAs, the facilitator center will organize three workshops for a total cost of \$11,000 which uses all of the funds available to the Catholic non-public schools [see green boxes above]. The cost to run each workshop in CCLS, DDI, and Behavior Management is indicated in each box above. Because LEAs are only allowed to pool funds WITHIN each individual LEA, participation is limited to the aggregate fund of the participating Catholic schools within EACH LEA. Participation can be flexible between NP A and NP B (it does not have to be equal or proportional because they agreed to pool AND they are both located in the same LEA); however, participation for those two schools in LEA #1 is limited to the contributory amount of \$1,000. The degree of participation for teachers (and other educational personnel) within the Catholic nonpublic schools in LEA #2 is equal to the total of \$700; LEA #3 is \$6,000; LEA #4 is \$3,300, and LEA #5 does not participate (considering this sole scenario of Catholic school involvement).

[PD Concept 1] Example 1 (Workshop on Common Core) for more than one LEA: Suppose NP D in LEA #3 has a total staff of 15 teachers who all wish to attend the workshop on CCLS. NP F in LEA #3 has a total staff of 75 teachers, of which 10 wish to attend the same workshop. Those 25 teachers can attend, even though NP D has exceeded its allocation by double ($\$40 \times 15 = \600).

Restriction to Example 1 (Workshop on Common Core) for more than one LEA: What cannot happen is that NP A and B in LEA #1 send more than 25 teachers ($\$40 \times 25 = \$1,000$). LEA #3's pooled balance of \$5,000 cannot be used to support participation of LEA #1's non-public teachers after the LEA #1 contributions are exhausted. That balance can ONLY be used to support continued participation, at any of the remaining workshops, of nonpublic teachers or other educational personnel in NP D and NP F that are physically located in LEA #3. NOTE: The PD venue may be located within or outside of the LEA and has no bearing on the pooling of funds.

Follow-up to Example 1 (Workshop on Common Core) for more than one LEA: Imagine that Example 1 for more than one LEA occurred. After participation, a balance of \$5,000 remains available for services to private schools in LEA #3. Two options are now available. The \$5,000 balance could be available to the facilitator center for use by the two Catholic private schools within LEA #3 which are schools "D" and "F." Also, either LEA #3 or the facilitator center can add the \$5,000 balance to the \$700 for NP "E" (also in LEA #3) and pool those resources on behalf of all three schools within that LEA.

Another Option for LEA #3: After the previous follow-up to Example 1, suppose the LEA #3 balance of \$5,000 is pooled with the \$700 for NP "E" for a total of \$5,700. Suppose that NP "E" cannot provide a highly qualified physics teacher (a shortage area) and would like to spend \$2,000 to support college course work for the certified Chemistry teacher pursuing certification in Physics (after a needs assessment

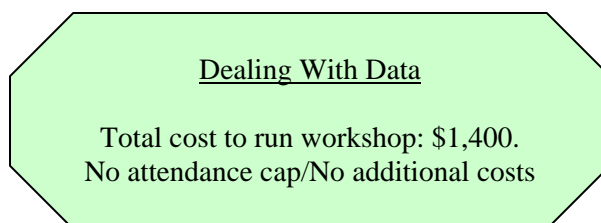
determined this as highest priority). In consultation and agreement with all NPs in LEA #3, the facilitator center may arrange to provide the full \$2,000 in services for NP “E” because the funds have been pooled.

[PD Concept 1] Example 2 (Workshop on Common Core) for one LEA: A facilitator center may organize workshops on behalf of each individual LEA, and funds can be pooled to serve the collaborative needs of all private schools within the LEA itself. Therefore, the facilitator center could operate a workshop in Common Core Learning Standards for LEA #4 costing the entire \$5,000 available to NPs G, H, I, and J. Teachers and administrators from G, H, I, and J could attend in any ratio from each of those schools. “G” may choose to send 2 people, “H” could send none, “I” could send the entire staff of 50, and “J” could send 18. Assume that there is a \$71 per person cost (\$5,000 divided by 70=\$71.43 each). This means that Nonpublic School “I” would actually receive \$3,550 in services even though it only has \$1,000 available directly.

[PD Concept 1] Example 3: LEA #2 and LEA #5 are each on their own. There is no other method by which they can pool funds. However, teachers (and other educational personnel) in NP “C” and NP “K” can attend any of the workshop(s) offered equal to the amount of funds that each has available by paying the participant cost, or they can select professional development opportunities unique to each school.

[PD Concept 1] Example 4: Yeshiva Schools “E,” “J,” and “K” are also unable to pool funds because each is located in a different LEA. However, teachers (and other educational personnel) in NP “E,” NP “J,” and NP “K” can attend any of the workshop(s) offered equal to the amount of funds that each has available by paying the participant cost, or they can select professional development opportunities unique to each school, or they may partner using PD Concept 2, an example of which is below [**See PD Concept 2 - Example 1 below**].

[PD Concept 2] Example 1 [See graphic below]: Suppose that all eleven private schools represent a total teaching staff of 210. The facilitator center is able to organize a one-day workshop on Dealing with Data for a total cost of \$1,400 by using a school auditorium at no cost, sending handouts electronically, and restricting costs to cover only the consultant fee and travel. The consultant welcomes all participants regardless of number. The school auditorium easily holds 210. NP “C” in LEA #2 and NP “K” in LEA #5 believe that this workshop is necessary to the needs of their schools (as do all other private schools). NP “C” and NP “K” agree to fund the \$1,400 cost of the necessary workshop and send all staff members. However, they may now invite all other nonpublic schools in the region to attend at no cost (free). They may also limit the number of additional free spots that are open to all other nonpublic schools. This is allowable.



Questions, comments, or suggestions can be addressed to: CONAPPTA@mail.nysed.gov .