PENNSYLVANIA CATHOLIC CONFERENCE

May 18, 2020

Via U.S. Mail and Electronic Mail
Susan McCrone, Division Chief
Division of Federal Programs Pennsylvania Department of Education
333 Market Street
Harrisburg, PA 17126-0333

RE: Formal Complaint Against PDE For Encouraging the Misallocation of ESSER Funds and Request for Expedited Review

Dear Ms. McCrone:

The Pennsylvania Catholic Conference ("PCC")[1] submits this Complaint to the Pennsylvania Department of Education ("PDE"), and asserts that PDE has violated the U.S. Department of Education's ("USDE") guidance related to distribution of funds under the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act"), Public Law 116-136, 134 Stat. 281 (Mar. 27, 2020), as well as the provisions of the CARES Act itself. PCC has, in recent days, communicated these concerns to PDE, and now, does so formally in accordance with PDE's Complaint Procedures. *See* Exhibit A, Correspondence with PDE.

The CARES Act requires a local educational agency ("LEA") that receives funds from a State Education Agency ("SEA") under either the Governor's Emergency Education Relief Fund ("GEER Fund") (CARES Act section 18002) or the Elementary and Secondary School Emergency Relief Fund ("ESSER Fund") (CARES Act section 18003) to provide equitable services to students and teachers in non-public schools. To briefly summarize the key points related to the ESSER Fund:

- Both the allocation to the SEA and the subgrants to the LEAs, use the current Title I formula for purposes of determining the amount of each grant.
- LEAs that receive ESSER Funds must provide equitable services in the same manner as provided under section 1117 of the Elementary and Secondary Education Act (ESEA) of 1965 to students and teachers in non-public schools.

[1] PCC is an association comprised of the eight Latin Rite Roman Catholic Dioceses of Pennsylvania and the two Byzantine Rite Catholic Dioceses whose territories include the Commonwealth of Pennsylvania. PCC was organized in 1960 in order to represent the views and the interests of the Catholic Dioceses of Pennsylvania on matters of public policy of interest to the Church, and to give witness to spiritual values in public affairs. Currently, there are more than 120,000 children in Pennsylvania's Catholic schools, and this Complaint is being filed on behalf of those students.

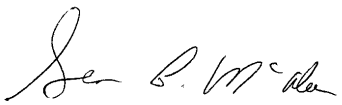
- An LEA must engage in meaningful consultation with non-public school officials on key issues relevant to the equitable participation. *See* Exhibit B, Affirmation of Consultation with Private (Nonpublic) School Officials Cares Act ESSERF.

On April 30, 2020, the USDE issued guidance on the provision of equitable services to students and teachers in non-public schools under the CARES Act. *See* Exhibit C, Providing Equitable Services to Students and Teachers in Non-Public Schools under the CARES Act Programs. The guidance contains questions related to the proper allocation of funds, including questions that clarify how an LEA determines each non-public school's share of the funds it receives from the SEA for services to its students. The USDE interpreted "in the same manner as under section 1117" in light of the significantly broader eligibility and uses of funds authorized under the CARES Act as compared to ESEA Title I, Part A, and directs LEAs to determine the total allocation for non-public schools based on total enrollments. *See* Exhibit C, Question 7.

On May 7, 2020, Pennsylvania's Secretary of Education, Pedro A. Rivera, sent a letter to the USDE's Assistant Secretary for Elementary and Secondary Education, Frank T. Brogan, urging the USDE to clarify the April 30 guidance and "encourage LEAs to use the percentage of FY 2019 Title I funds set aside for equitable services and apply that percentage to ESSER allocations." *See* Exhibit D. On May 13, 2020, Governor Tom Wolf announced that the USDE approved Pennsylvania's application for ESSER Funds, resulting in a one-time emergency allocation of $523.8 million. After Governor Wolf's announcement, PDE posted its proposed ESSER LEA Allocations to its website. See Exhibit E, ESSER LEA Allocations. The ESSER LEA Allocations, in table format, contains the LEA, LEA Share, Non-Public Equitable Share Percentage Extracted from 2019 Title I Application, and the Non-Public Share. PDE based the non-public share percentage on Title I dollars, not on total enrollments, in violation of the CARES Act and of USDE's guidance. Herein lies the basis for this Complaint.

Since PDE has already or will shortly begin to disburse the ESSER Funds to LEAs in a manner that unlawfully deprives non-public school students of their equitable share of those funds, PCC respectfully requests PDE to expedite its investigation and resolution of this complaint and provide immediate relief to the students enrolled in the Catholic schools in the Commonwealth.

Sincerely,



Sean P. McAleer, MGA
Director of Education
PA Catholic Conference

cc: Secretary Betsy DeVos, U.S. Department of Education
Office of Non-Public Education, U.S. Department of Education
Acting Inspector General Sandra Bruce, U.S. Department of Education Office

Exhibit A

Correspondence with PDE related to CARES Act and ESSER Fund

From: Sean McAleer
Sent: Monday, March 30, 2020 7:21 PM
To: McCrone, Susan
Cc: 'Calvello, Lynn'; Salonick, Melanie
Subject: Title Programs

Hi Susan,

I hope you and the entire Federal Programs family are doing well and staying healthy. I know you are very busy, but I wanted to check to see if all the Title programs are ongoing in every LEA during these trying times?

Catholic schools in every diocese are continuing to educate their students through distance learning platforms. As you are aware the Title programs are an extremely important part of the total education package schools offer.

Thanks,
Sean P. McAleer, MGA
Director of Education
PA Catholic Conference
214 State Street
Harrisburg, PA 17101
717.238.9613 Office
717.514.1882 Cell
717.238.1473 Fax
www.pacatholic.org

From: McCrone, Susan [mailto:smccrone@pa.gov]
Sent: Monday, April 06, 2020 1:42 PM
To: Sean McAleer
Cc: Calvello, Lynn; Salonick, Melanie
Subject: RE: [External] Title Programs

Hi Sean,

Thank you for reaching out – I hope you are doing well. Lynn and Melanie have listened in on one Ombudsman call and have one scheduled for tomorrow afternoon. We should know tomorrow afternoon and will follow up with you.

Thanks, take care,

Susan

Susan McCrone | Chief
Pennsylvania Department of Education|Division of Federal Programs
333 Market Street | Harrisburg PA 17126-0333
(717) 783-6910 | www.education.pa.gov

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From: Sean McAleer
Sent: Monday, April 06, 2020 2:11 PM
To: 'McCrone, Susan'
Cc: Calvello, Lynn; Salonick, Melanie
Subject: RE: [External] Title Programs

Susan,

Thank you. Can you look into one additional matter regarding Divine Mercy Catholic Academy's reimbursement check for $66,000. I believe Jo-Ann from the Diocese of Altoona-Johnstown emailed you and asked if you could make the check payable to the Diocese instead of to the school. Do you know if a check has been sent?

Thank you,

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From: Sean McAleer
Sent: Thursday, April 09, 2020 11:35 AM
To: 'McCrone, Susan'
Cc: Calvello, Lynn; Salonick, Melanie
Subject: RE: [External] Title Programs

Hi Susan, Lynn and Melanie,

I hope you are all doing well and staying healthy. I know it's a difficult time and the guidance hasn't been finalized yet, but I was wondering if PDE could host a webinar with all the nonpublic school leaders in a couple of weeks? I continue to send everything I receive to all the nonpublic contacts I have, but hearing direct information from you would be extremely helpful. Please let me know your thoughts?

Have a Blessed and healthy Easter/Passover.

God Bless,

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From: Sean McAleer
Sent: Thursday, April 16, 2020 3:21 PM
To: McCrone, Susan (smccrone@pa.gov); Calvello, Lynn; 'Salonick, Melanie'
Cc: Fitterer, Angela; 'Stephen, Jason'
Subject: Education Stabilization Fund

Hi Everyone,:

I am sending you this email concerning the equitable participation of Catholic/private school students, teachers, other educational personnel, and families in the services and benefits of the Education Stabilization Fund (ESF) sections of the CARES Act.

There are three key elements to this new fund that we request you urgently convey to Local Educational Agencies (LEAs), and the non-public school community:

- The ESF is a new emergency education fund, unrelated to the Elementary and Secondary Education Act (ESEA) or the Individuals with Disabilities Education Act (IDEA).

- There are two grants within the fund, (The Governors Emergency Relief Fund & The Elementary and Secondary Relief Fund) and equitable services are required to non-public schools under both grants.

- All non-public schools are eligible to participate in the ESF, no matter their prior participation in ESEA or IDEA and no matter their Title I count.

Section 18003(b) and 18003(c), which govern allocations to SEAs and LEAs under the Elementary and Secondary Education Relief Fund. Section 18003(b) allocates funds to the states in the same proportion as each state received under Part A of Title I in the most recent fiscal year. Likewise, Section 18003(c) allocates 90 percent of the amount of a State's allocation to LEAs in the same proportion as each LEA received under Part A of Title I in the most recent fiscal year. Since the funding is based on an already conducted Title I count, there is no reason to ask private schools to ascertain any count of private school students for the purpose of Section 18003 funding.

Section 18005(a) requires LEAs receiving funds under Section 18003 to provide equitable services in the same manner as provided under Section 1117 of ESEA, as determined in consultation with representatives of non-public school students. Section 1117 of ESEA refers to the manner in which services are provided (i.e. equitably) and does not refer to the allocation or eligible uses of the funds, since the only reference to the allocation is in Sections 18003(b) and 18003(c).

LEAs having clear direction from your office from the very beginning will best assure that implementation proceeds swiftly, without public and private school representatives having to negotiate over the amount of funding available for assistance to private schools.

Please feel free to contact me with any questions,

Regards,

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From: Sean McAleer
Sent: Wednesday, May 13, 2020 2:45 PM
To: McCrone, Susan (smccrone@pa.gov)
Cc: Calvello, Lynn; Salonick, Melanie
Subject: Virtual Trainings

Hi Susan, Lynn & Melanie,

I hope you are doing well and staying healthy. I can't thank you enough for hosting the virtual training meeting starting next week. I know there is a lot of confusion regarding the CARES Act funding and that is why I would like to review the agenda before the meetings, so I can address any concerns with you.

As you are aware, I always review the PAFPC's meeting agenda before their meetings so I can address any concerns regarding nonpublic schools. This process prevents further confusion for all stakeholders, so the meetings can stay on point. with your permission, I would like the same opportunity with the virtual agenda's that affect nonpublic schools as well (Equitable Services Consultation Requirements & CARES Act Relief Funds and Federal Funds-Waivers).

Knowing that you are all very busy, I will make myself available anytime you are available to discuss. I have attached some helpful guidance I received regarding the ESSER funds from CAPE for your review.

Thank you,
Sean P. McAleer, MGA
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"For I do not seek to understand so that I may believe;
but I believe so that I may understand. For I believe
this also, that unless I believe, I shall not understand."
St. Anselm

[Informational Attachment Contained in Original Email Not Included]

From: Sean McAleer
Sent: Thursday, May 14, 2020 3:17 PM
To: Calvello, Lynn (lcalvello@pa.gov); Salonick, Melanie (msalonick@pa.gov)
Cc: McCrone, Susan (smccrone@pa.gov); Eric Failing
Subject: ESSER Nonpublic Share

Lynn & Melanie,

As a representative of all the Catholic schools in Pennsylvania, I just noticed PDE posted the ESSER LEA and nonpublic share (Link below). PDE did not follow the guidance offered by USDE (Attached) regarding the nonpublic proportionate share (All students/Title II) allocation. PDE and DFP followed the Title I allocation proportionate share, which only identifies the low income students in a school and not the total school population.

I need a response immediately, or I will be forced to appeal all the nonpublic allocations to USDE.

ESSER LEA Allocations (Excel)

Regards,

Sean P. McAleer, MGA
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St. Anselm

[Informational Attachment Contained in Original Email Not Included]

From: Sean McAleer
Sent: Thursday, May 14, 2020 5:03 PM
To: Calvello, Lynn (lcalvello@pa.gov); Salonick, Melanie (msalonick@pa.gov)
Cc: McCrone, Susan (smccrone@pa.gov); Eric Failing
Subject: RE: ESSER Nonpublic Share

Hello Everyone,

Could you please accept this email as my formal complaint or grievance for the ESSER funding for nonpublic school students.

Could you also let me know if there is a formal compliant process I need to follow? I looked on FPD's and PDE's website and was not able to find the process.

Thank you,

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Exhibit B

Affirmation of Consultation with Private (Nonpublic) School Officials Cares Act ESSERF

Affirmation of Consultation with Private (Nonpublic) School Officials CARES Act ESSERF

The goal of reaching agreement between an LEA and appropriate nonpublic school officials is grounded in timely, and meaningful consultation on key issues that are relevant to the equitable participation in the ESSERF (18003) of the CARES Act.

LEA INFORMATION	
NAME OF LEA:	TELEPHONE NUMBER:
NAME OF SUPERINTENDENT/LEA AUTHORIZED REPRESENTATIVE:	EMAIL ADDRESS:
NONPUBLIC SCHOOL INFORMATION	
NAME OF NONPUBLIC SCHOOL:	TELEPHONE NUMBER:
NONPUBLIC SCHOOL AUTHORIZED REPRESENTATIVE:	EMAIL ADDRESS:

The services and benefits available to nonpublic school students and teachers are the same as those available to public school students and teachers. Specifically, the ESSER funds that flow to LEAs by formula may be used for a broad range of allowable activities. Sec. 18003(d) of the CARES Act as listed below:

- ☐ Any activity authorized by the ESEA of 1965, including the Native Hawaiian Education Act and the Alaska Native Educational Equity, Support, and Assistance Act (20 U.S.C. 6301 et seq.), the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) (“IDEA”), the Adult Education and Family Literacy Act (20 U.S.C. 1400 et seq.), the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) (“the Perkins Act”), or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.).
- ☐ Coordination of preparedness and response efforts of local educational agencies with State, local, Tribal, and territorial public health departments, and other relevant agencies, to improve coordinated responses among such entities to prevent, prepare for, and respond to coronavirus.
- ☐ Providing principals and others school leaders with the resources necessary to address the needs of their individual schools.
- ☐ Activities to address the unique needs of low-income children or students, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and foster care youth, including how outreach and service delivery will meet the needs of each population
- ☐ Developing and implementing procedures and systems to improve the preparedness and response efforts of local educational agencies.
- ☐Training and professional development for staff of the local educational agency on sanitation and minimizing the spread of infectious diseases.
- ☐ Purchasing supplies to sanitize and clean the facilities of a local educational agency, including buildings operated by such agency.
- ☐ Planning for and coordinating during long-term closures, including for how to provide meals to eligible students, how to provide technology for online learning to all students, how to provide guidance for carrying out requirements under the Individuals with Disabilities Education Act (20 U.S.C. 1401 et seq.) and how to ensure other educational services can continue to be provided consistent with all Federal, State, and local requirements
- ☐ Purchasing educational technology (including hardware, software, and connectivity) for students who are served by the local educational agency that aids in regular and substantive educational interaction between students and their classroom instructors, including low-income students and students with disabilities, which may include assistive technology or adaptive equipment
- ☐ Providing mental health services and supports.
- ☐ Planning and implementing activities related to summer learning and supplemental afterschool programs, including providing classroom instruction or online learning during the summer months and addressing the needs of low income students, students with disabilities, English learners, migrant students, students experiencing homelessness, and children in foster care.
- ☐ Other activities that are necessary to maintain the operation of and continuity of services in local education agencies.

By signing this form you affirm the following:
We agree timely and meaningful consultation occurred prior to the district making any decisions which affected the participation of eligible nonpublic school students in the program.

We agree we have disucssed the allowable use of funds as defned in the ESSER of the CARES Act.

We agree that timely and meaningful consultation shall continue throughout implementation and assessment of services provided under the ESSERF.

NONPUBLIC SCHOOL CARES ACT PROGRAM PARTICIPATION:	ESSER Fund ☒
LEA AUTHORIZED REPRESENTATIVE SIGNATURE:	DATE:
NONPUBLIC SCHOOL AUTHORIZED REPRESENTATIVE SIGNATURE:	DATE:

(Check box / sign below ONLY if in disagreement with the LEA)

☐ **By checking this box and signing within you are indicating that you believe the timely and meaningful consultation HAS NOT occurred or the program design is not equitable with respect to eligible nonpublic school children.**

NONPUBLIC SCHOOL AUTHORIZED REPRESENTATIVE SIGNATURE:	DATE:

THE SCHOOL DISTRICT MUST MAINTAIN A COPY OF THIS FORM IN ITS RECORDS FOR PROGRAM MONITORING/AUDIT REVIEW / ALSO PROVIDE A COPY TO THE PENNSYLVANIA DEPARTMENT OF EDUCATION VIA EGRANTS UPLOAD to the ESSER Application.

Exhibit C

Providing Equitable Services to Students and Teachers in Non-Public Schools under the CARES Act Programs

PROVIDING EQUITABLE SERVICES TO STUDENTS AND TEACHERS IN NON-PUBLIC SCHOOLS UNDER THE CARES ACT PROGRAMS

U.S. Department of Education
Washington, D.C. 20202

April 30, 2020

Purpose of this Document

The purpose of this document is to provide information about equitable services for students and teachers in non-public schools under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, 134 Stat. 281 (Mar. 27, 2020). The CARES Act authorized the Education Stabilization Fund (ESF), which is a new appropriation of approximately $30.75 billion that creates funding streams for several distinct education programs that address the impact of the Novel Coronavirus Disease 2019 (COVID-19) on educational services across the Nation. Under these programs, the U.S. Department of Education (Department) will make awards to Governors, State educational agencies (SEAs), and institutions of higher education (IHEs) to help States to prevent, prepare for, and respond to the devastating effects of COVID-19. The provisions of the CARES Act relevant to the ESF and other Department programs are available on the Department's website at https://oese.ed.gov/offices/education-stabilization-fund/.

Two programs in the ESF require a local educational agency (LEA) that receives funds to provide equitable services to students and teachers in non-public schools:

- The Governor's Emergency Education Relief Fund (GEER Fund) totaling $2,953,230,000 (Section 18002 of the CARES Act).
- The Elementary and Secondary School Emergency Relief Fund (ESSER Fund) totaling $13,229,265,000 (Section 18003 of the CARES Act).

Other than statutory and regulatory requirements included in the document, such as those pursuant to the authorizing statute and other applicable laws and regulations, the contents of the guidance do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. In addition, it does not create or confer any rights for or on any person.

The Department will provide additional or updated information as necessary on the Department's COVID-19 webpage: https://www.ed.gov/coronavirus. If you have questions that are not answered in this document, please e-mail COVID-19@ed.gov.

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Providing Equitable Services to Students and Teachers in Non-Public Schools under the CARES Act Programs

1. Does the requirement to provide equitable services to students and teachers in non-public schools apply to any programs under the CARES Act?

Yes. The CARES Act establishes two new funds to which equitable services requirements apply. Specifically, a local educational agency (LEA) that receives funds under either the Governor's Emergency Education Relief Fund (GEER Fund) (section 18002 of the CARES Act) or the Elementary and Secondary School Emergency Relief Fund (ESSER Fund) (section 18003 of the CARES Act) ("CARES Act programs" for purposes of this document) to provide equitable services to students and teachers in non-public schools in the same manner as provided under section 1117 of the Elementary and Secondary Education Act of 1965 (ESEA). (Section 18005(a) of the CARES Act).

An institution of higher education or education-related entity that receives funds under the GEER Fund is not required to provide equitable services to students and teachers in non-public schools.

2. What is a "non-public school" under the CARES Act programs?

A "non-public school" means a non-public elementary or secondary school that (A) is accredited, licensed, or otherwise operates in accordance with State law; and (B) was in existence prior to the date of the qualifying emergency for the CARES Act programs. For purposes of this definition, the date of the qualifying emergency is March 13, 2020. (Section 18007(6) of the CARES Act).

3. Is a for-profit non-public school eligible to receive equitable services for its students and teachers under the CARES Act programs?

No. A for-profit non-public school is not eligible to receive equitable services for its students and teachers under the CARES Act programs. Section 18007(6) of the CARES Act defines a "non-public school" as a non-public elementary or secondary school. Section 18007(8) of the CARES Act incorporates the definitions in ESEA section 8101 for any terms not defined in the CARES Act. ESEA section 8101(19) and (45) defines "elementary school" and "secondary school," respectively, and specifies that they must be non-profit.

4. Which LEA is responsible for providing equitable services to non-public school students and teachers under the CARES Act programs?

The Department has determined that, under the CARES Act programs, the LEA in which a non-public school is located is responsible for providing equitable services to students and teachers in the school, as it is under most ESEA programs that require an LEA to provide equitable services. Outside of Title I, Part A, the responsibility typically falls on the LEA in which a non-public school is located because equitable services are generally available

to all students or teachers in the non-public school in the LEA and the LEA in which the school is located is closest and best able to meet the needs of students and teachers.

Title I, Part A of the ESEA is different; ESEA section 1117 sets forth a student residency requirement, rather than a school location requirement, for receipt of equitable services under Title I, Part A. Only low-achieving students who live in a participating Title I public school attendance area are eligible for services and, therefore, the LEA where students reside is responsible for providing equitable services. The CARES Act programs have no such residency requirement for eligibility for services. Rather, the CARES Act programs provide LEAs full discretion, unless funds are targeted for a specific purpose or population of public and non-public school students by the Governor under the GEER Fund or by an SEA through the SEA reserve under the ESSER Fund (see section 18003(e) of the CARES Act), to use CARES Act funds to provide educational services to students in public and non-public schools in the LEA through a broad range of allowable activities. Thus, providing equitable services with CARES Act funds is similar to other ESEA programs where equitable services are provided by the LEA in which a non-public school is located.

5. Must an LEA or another public agency maintain control of CARES Act funds used to provide equitable services?

Yes. Control of funds for services and assistance provided to non-public school students and teachers under the CARES Act programs, and title to materials, equipment and property purchased with such funds, must be in a public agency, and a public agency must administer such funds, materials, equipment, and property. In other words, no funds may go directly to a non-public school. In addition, services for non-public school students and teachers must be provided by a public agency directly or through contract with another public or private entity. (Section 18005(b) of the CARES Act).

6. Who is responsible for initiating the consultation process and how should it begin?

Similar to how an LEA provides equitable services under the ESEA, an LEA is responsible for initiating the consultation process. It must contact officials in all non-public schools in the LEA to notify them of the opportunity for their students and teachers to obtain equitable services under the CARES Act programs. Through this initial contact, the LEA can explain the services available under the CARES Act programs and how non-public school students and teachers can participate. If non-public school officials have not been contacted, they may contact the LEA or the State ombudsman to inquire about equitable services under the CARES Act programs.

If non-public school officials want equitable services for their students and teachers, the LEA must consult with those officials during the design and development of the LEA's programs and before the LEA makes any decision that affects the opportunity of non-public school students and teachers to participate in the activities funded under the CARES Act programs. If a non-public school declines to participate in the CARES Act programs or does not respond to an LEA's good-faith effort to make contact, the LEA has no further responsibility to provide equitable services to students or teachers in that school. The LEA, however, must be able to demonstrate that it made a good faith effort to contact all the non-public schools in the LEA.

7. How does an LEA that receives funds under the CARES Act programs provide equitable services "in the same manner as provided under section 1117 of the ESEA"?

An LEA that receives funds under the CARES Act programs must provide equitable services to students and teachers in a non-public school in the same manner as provided under section 1117 of the ESEA, as determined in consultation with representatives of non-public schools. (Section 18005(a) of the CARES Act). This requirement, on its face, necessitates that the Department interpret how the requirements of section 1117 apply to the CARES Act programs, given that an LEA under the CARES Act programs may serve all non-public school students and teachers without regard to family income, residency, or eligibility based on low achievement. Unless the requirements of section 1117 would limit equitable services under the CARES Act programs, we conclude they apply as outlined below.

We have interpreted "in the same manner as under section 1117" in light of the significantly broader eligibility and uses of funds authorized under the CARES Act as compared to Title I, Part A, reasonably reconciling differences. In doing so, we gave meaning to section 1117(a)(3), which requires educational services and other benefits for students in non-public schools to be equitable in comparison to those for public school students. The services that an LEA may provide under the CARES Act programs are clearly available to *all* public school students and teachers, not only low-achieving students and their teachers as under Title I, Part A. Similarly, there is no limitation on residence in a participating Title I public school attendance area for services provided in public schools under the CARES Act programs. For CARES Act services to be equitable in comparison to public school students and teachers, it follows that the same principles must apply in providing equitable services to non-public school students and teachers.

The following describes how the provisions of ESEA section 1117 apply, reconciled, when necessary, to meet the purposes of the CARES Act programs:

- 1117(a)(1) – Under Title I, Part A, an LEA must provide equitable services to low-achieving students as defined in ESEA section 1115(c) who reside in a participating Title I public school attendance area and attend a non-public school and their teachers. Under the CARES Act programs, an LEA may provide equitable services with CARES Act funds to any students and teachers in non-public schools, unless limited by a Governor under section 18002 of the CARES Act or an SEA through the SEA's reserve under section 18003(e) of the CARES Act. (See Questions #8 and #9).
- 1117(a)(2) – Under both Title I, Part A and the CARES Act programs, an LEA must provide equitable services and other benefits, including materials and equipment, that are secular, neutral, and nonideological.
- 1117(a)(3)(A) – Under both Title I, Part A and the CARES Act programs, an LEA must provide services and other benefits for non-public school students and teachers in a timely manner that are equitable in comparison to the services and benefits provided for public school students and teachers.

- 1117(a)(3)(B) – Under Title I, Part A, an SEA must designate an ombudsman to monitor and enforce the equitable services requirements. An SEA must use the ombudsman also to monitor and enforce the requirements of the CARES Act programs that an LEA provide equitable services to students and teachers in non-public schools.
- 1117(a)(4)(A) – Under both Title I, Part A and the CARES Act programs, an LEA must determine the proportional share available to provide equitable services to students and teachers in non-public schools based on the total amount of funds an LEA receives prior to any allowable expenditures or transfers. Under the CARES Act programs, the LEA calculates the proportional share based on the number of children enrolled in each non-public school whose students or teachers participate in the CARES Act programs compared to the number of students enrolled in public schools in the LEA. The LEA makes this determination under each CARES Act program separately. (See Question #10).
- 1117(a)(4)(B) – Under Title I, Part A, an LEA must obligate funds available for equitable services in the fiscal year for which the funds are received by the LEA. An LEA must obligate CARES Act funds for equitable services in the fiscal years for which those funds are intended for services to address the impact of COVID-19.
- 1117(a)(4)(C) – Under both Title I, Part A and the CARES Act programs, an SEA must provide notice in a timely manner to appropriate non-public school officials in the State of the allocation of funds for educational services and other benefits that each LEA has determined are available for non-public school students and teachers.
- 1117(b)(1) – Under both Title I, Part A and the CARES Act programs, an LEA must consult with appropriate non-public school officials during the design and development of the LEA's activities on relevant issues such as those contained in this section of Title I, Part A. The LEA and non-public school officials shall both have the goal of reaching agreement on how to provide equitable and effective services and the LEA must transmit the results of that agreement to the ombudsman.
- 1117(b)(2) – Under both Title I, Part A and the CARES Act programs, if an LEA disagrees with the views of non-public school officials during consultation, the LEA must provide in writing to the non-public school officials the reasons why the LEA disagrees.
- 1117(b)(3) – Under both Title I, Part A and the CARES Act programs, consultation must occur before an LEA makes any decision that affects the opportunities of non-public students and teachers to receive equitable services. Meetings between the LEA and non-public school officials need not occur in person if they cannot be conducted due to closed schools or social distancing rules. In this case, the Department recommends LEAs and non-public school officials consult remotely.
- 1117(b)(4) – Under both Title I, Part A and the CARES Act programs, consultation must include discussion of service delivery mechanisms an LEA may use to provide equitable services.
- 1117(b)(5) – Under both Title I, Part A and the CARES Act programs, an LEA must maintain and provide to the SEA written affirmation signed by non-public

school officials that timely and meaningful consultation has occurred and, if non-public school officials do not provide such affirmation, the LEA must forward to the SEA the documentation that such consultation has, or attempts at such consultation have, taken place.

- 1117(b)(6) – Under both Title I, Part A and the CARES Act programs, non-public school officials have a right to file a complaint with the SEA; the SEA must provide services directly or through contracts if requested to do so by non-public school officials and the SEA determines that the LEA did not meet applicable requirements.
- 1117(c)(1) – Under Title I, Part A, to determine the proportional share, an LEA must calculate the number of children, ages 5 through 17, who are from low-income families and reside in a participating Title I public school attendance area. Because an LEA determines the proportional share based on enrollment in public and non-public schools under the CARES Act programs, the LEA need not collect poverty data from non-public schools (see Question #10 for information on determining the proportional share of CARES Act funds the LEA must reserve to provide equitable services to non-public school students and teachers).
- 1117(c)(2) – Under Title I, Part A, non-public school officials may file a complaint with the SEA if they dispute the count of children from low-income families. Because an LEA need not collect poverty data to determine the proportional share available for equitable services under the CARES Act programs, there would be no reason for non-public school officials to file a complaint regarding poverty data with the SEA.
- 1117(d) – Under Title I, Part A, control of funds and title to materials, equipment, and property must be in public agency. With respect to the CARES Act programs, this provision is superseded by section 18005(b) of the CARES Act, which also requires public control of funds. (See Question #5).

8. Must an LEA offer to provide equitable services under the CARES Act programs to students and teachers in all non-public schools located in the LEA, even if a non-public school has not previously participated in equitable services under Title I, Part A or Title VIII of the ESEA?

Yes. An LEA must offer to provide equitable services under the CARES Act programs to students and teachers in all non-public schools located in the LEA, even if a non-public school has not previously participated under Title I, Part A or Title VIII of the ESEA.

9. Are all students and teachers in a non-public school eligible to receive equitable services under the CARES Act programs?

Yes. All students and teachers in a non-public school are eligible to receive equitable services under the CARES Act programs, unless a Governor (under the GEER Fund) or an SEA (through the SEA reserve under the ESSER Fund) targets funds for a specific purpose or population of public and non-public school students. Unlike Title I, Part A, equitable services under the CARES Act programs are not based on residence in a participating Title

I public school attendance area and are also not limited only to low-achieving students and their teachers.

10. How does an LEA determine the proportional share of funds that must be reserved to provide equitable services to non-public school students and teachers under the CARES Act programs?

A. What is the base amount on which the proportional share is determined?

Under ESEA section 1117(a)(4)(A)(ii), an LEA must determine the proportional share available for equitable services from the total amount of Title I, Part A funds it receives prior to reserving funds for allowable expenditures such as administrative costs or districtwide expenditures, and before making allocations to participating public schools. Because section 18005(a) of the CARES Act requires an LEA to provide equitable services under the CARES Act programs "in the same manner as provided under section 1117," an LEA must use the total allocation it receives under each CARES Act program to determine the proportional share available for equitable services before reserving funds for other purposes.

B. What data does an LEA use to determine the proportional share?

An LEA uses enrollment data in non-public schools whose students and teachers will participate under the CARES Act programs compared to enrollment in public schools in the LEA to determine the proportional share. Under the CARES Act programs, services are available for all students—public and non-public—without regard to poverty, low achievement, or residence in a participating Title I public school attendance area. An LEA that receives CARES Act funds uses those funds to provide educational services to students in both public and non-public schools through a broad range of allowable activities. Using enrollment to determine the proportional share from which to provide equitable services will contribute to the equitable treatment of children and teachers within the statutory universe of permissible uses for CARES Act dollars by allowing all students and teachers in a non-public school to receive services that are equitable compared to those available to all public school students and teachers. (See ESEA section 1117(a)(3)).

C. How does an LEA calculate the proportional share?

To calculate the proportional share for equitable services under the CARES Act programs, an LEA determines the overall number of children who are enrolled in public schools and non-public schools in the LEA that wish to participate under one or both CARES Act programs. Using the proportion of students who are enrolled in participating non-public schools, the LEA determines the amount of funds available for equitable services based on that proportional share of the LEA's total allocation under each CARES Act program separately. For example, an LEA receiving $100,000 under the GEER Fund and $900,000 under the ESSER Fund, and with 1,350 public school students and 150 non-public school students, would determine the proportional share as follows:

EXAMPLE – DETERMINING THE PROPORTIONAL SHARE			
	Public	**Non-Public***	**Total**
Enrollment	1,350	150	1,500
Proportion	90%	10%	100%
Proportional Share GEER Fund	$90,000	$10,000	$100,000
Proportional Share ESSER Fund	$810,000	$90,000	$900,000

*Non-public schools participating under the CARES Act programs.

11. After an LEA has determined the proportional share of funds for equitable services under each CARES Act program, how does it then determine the amount of funds available for services to students and teachers in individual non-public schools?

For consultation purposes, in order to determine what equitable services to provide to students and teachers in a given non-public school, an LEA, after reserving funds that are reasonable and necessary for administering equitable services under the CARES Act programs, would divide the remainder of the proportional share of funds available for equitable services by the total enrollment in non-public schools whose students and teachers will participate in each of the CARES Act programs to obtain a per-pupil amount. The LEA would then multiply that per-pupil amount by the enrollment in an individual non-public school to determine the amount of services the LEA can provide to students and teachers in that school. With agreement between the LEA and appropriate non-public school officials, the LEA may pool funds among a group of non-public schools and provide equitable services to students and teachers in non-public schools within the pool based on need without regard to how the funds were generated. (See ESEA section 1117(b)(1)(J)(i)).

12. Do the requirements in 34 C.F.R. § 200.66 apply to equitable services under the CARES Act programs?

No. The requirements in 34 C.F.R. § 200.66 do not apply to equitable services under the CARES Act programs. 34 C.F.R. § 200.66 is a Title I, Part A regulation that requires an LEA to provide Title I, Part A services that (1) supplement, and in no case supplant, the services that would, in the absence of Title I, Part A services, be available to participating non-public school students; and (2) only meet the needs of participating non-public school students and not the needs of the non-public school or the general needs of children in the non-public school. These provisions are necessary in the Title I, Part A context because equitable services must be supplemental to what non-public students otherwise receive and may only be provided to low-achieving students who reside in a participating Title I public school attendance area and attend a non-public school.

Equitable services under the CARES Act programs are much broader than under Title I, Part A. Equitable services under the CARES Act programs, by definition, may benefit a non-public school, such as purchasing supplies to sanitize and clean the facility, or all students in a non-public school, such as any activity authorized under the ESEA. Unlike Title I, they are not based on residence in a participating Title I public school attendance

area or limited only to low-achieving students. Moreover, the CARES Act does not have a supplement not supplant requirement.

13. Is a non-public school whose students and teachers receive equitable services under the CARES Act programs a "recipient of Federal financial assistance"?

No. A non-public school whose students and teachers receive equitable services under the CARES Act programs is not a "recipient of Federal financial assistance." A public agency must control and administer the CARES Act funds; in other words, no funds may go directly to a non-public school. (See Question #5). Thus, a non-public school is not a recipient of Federal financial assistance by virtue of its students and teachers receiving equitable services from an LEA under a CARES Act program. As a result, certain Federal requirements that apply to a recipient of Federal financial assistance are not directly applicable to a non-public school whose students or teachers receive equitable services under the CARES Act programs, unless the school otherwise receives Federal financial assistance for other purposes.

14. What services and benefits under the CARES Act programs are available to non-public school students and teachers?

In general, the services and benefits available to non-public school students and teachers are the same as those available to public school students and teachers. Specifically, the ESSER funds that flow to LEAs by formula may be used for a broad range of allowable activities. (See section 18003(d) of the CARES Act). The ESSER funds that an SEA may reserve for State purposes may also be used for a broad range of activities to address issues responding to COVID-19, unless the SEA decides to target them for a specific purpose or population of public and non-public school students. For example, an SEA could target the SEA reserve to provide technology to support distance learning for public and non-public school students from low-income families. (See section 18003(e) of the CARES Act). Similarly, a Governor may target GEER funds that it makes available to an LEA for a specific purpose or population of public and non-public school students. (See section 18002(c)(1) or (3) of the CARES Act).

In sum, equitable services permitted under sections 18002(c)(1) or (3), as applicable, and 18003(d) of the CARES Act must be available to best meet the needs of non-public school students and teachers, as determined through timely and meaningful consultation and consistent with any specific purposes established by a Governor under the GEER Fund or SEA through the SEA reserve under the ESSER Fund, regardless of the specific uses determined by the LEA to meet its own students' and teachers' particular needs.

As noted in Question #5, the control of any services or assistance provided to students and teachers in a non-public school, and title to materials, equipment, and property purchased with CARES Act funds, must be in a public agency and a public agency must administer those funds, materials, equipment, and property. A public entity must provide those services either directly or through a contract with a public or private entity.

Exhibit D

May 7, 2020 PDE Letter to USDE

pennsylvania
DEPARTMENT OF EDUCATION

May 7, 2020

The Honorable Frank T. Brogan
Assistant Secretary for Elementary and Secondary Education
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Assistant Secretary Brogan:

Thank you for your leadership in ensuring timely, clear communication from the U.S. Department of Education (USDE) as states respond to the immediate effects of the COVID-19 pandemic, implement state-level waivers granted by your agency, and work to administer emergency funding under the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

As Pennsylvania's CARES planning unfolds, I am seeking clarification concerning USDE's "Providing Equitable Services to Students and Teachers under the Coronavirus Aid, Relief, and Economic Security (CARES) Act Programs" document issued April 30, 2020. While I understand that this guidance does not have the force and effect of law, the document has created confusion as Pennsylvania works to ensure timely allocation of CARES Act funds.

Under the CARES Act statute and USDE's longstanding interpretation of equitable participation, local education agency (LEA) reservations for services to nonpublic schools are based on the number of low-income children in each participating non-public school in the LEA. USDE's guidance, suggesting that LEAs should instead base these calculations on the total number of nonpublic students, is inconsistent with the CARES statute; the fiscal year 2019 Title I-A administration that serves as the basis of CARES Act allocations; and, crucially, our shared goal of ensuring that limited, one-time, emergency funding reaches our most vulnerable students, wherever they attend school.

Initial analysis by the Pennsylvania Department of Education over the past 24 hours, using data derived from approximately 45 percent of the commonwealth's school districts, indicates that USDE's April 30 guidance would roughly double Equitable Services reservations, compared with the statutorily defined calculation. These sharply increased reservations would impact districts of every type—large urban, small urban, suburban, and rural; please see below for a sampling of these impacts.

School districts	Increase in support flowing from most disadvantaged to more advantaged students
Large Urban	
Philadelphia	53%
Pittsburgh	124%
Small Urban	
Altoona	605%
Erie City	104%
Greater Johnstown	110%
Scranton	797%
Williamsport Area	564%
York City	354%
Suburban	
Bristol Borough	2324%
Manheim Township	1617%
Rose Tree Media	4634%
Upper Darby	1104%
York Suburban	4084%
Rural	
Blue Ridge	3873%
Clarion Area	735%
Mifflin County	335%
Northeast Bradford	932%
Warren County	248%

These outcomes, observed in districts and communities of every type, are clearly inequitable. Accordingly, I urge USDE to clarify the April 30 guidance, outline data elements and procedures for calculating equitable services consistent with the CARES Act, and encourage LEAs to use the percentage of FY 2019 Title I funds set aside for equitable services and apply that percentage to ESSER allocations and any GEER funds. This approach will ensure that critical CARES support is provided in a consistent, transparent, and equitable manner.

Sincerely,

Pedro A. Rivera
Secretary of Education

cc: Council of Chief State School Officers

Exhibit E

ESSER LEA Allocations

These figures reflect the percentage of Fiscal Year 2019 Title I-A funds the grantee reserved for equitable services. Per the CARES Act, LEAs should consult with all nonpublic schools in the LEA that serve low income children.

LOCAL EDUCATION AGENCY (LEA)	LEA SHARE OF 2020-21 ELEMENTARY AND SECONDARY EMERGENCY RELIEF FUND	NONPUBLIC EQUITABLE SHARE PERCENTAGE EXTRACTED FROM 2019 TITLE I APPLICATION	NONPUBLIC SHARE OF 2020-21 ELEMENTARY AND SECONDARY EMERGENCY RELIEF FUND*
Abington Heights SD	$226,310.00	0.2991%	$677
Abington SD	$556,425.00	1.7660%	$9,827
Achievement House CS	$151,349.00	0.0000%	$0
Ad Prima CS	$436,125.00	0.0000%	$0
Agora Cyber CS	$2,038,307.00	0.0000%	$0
Albert Gallatin Area SD	$1,281,321.00	2.0460%	$26,216
Aliquippa SD	$794,013.00	2.5100%	$19,930
Allegheny Valley SD	$177,912.00	0.3601%	$641
Allegheny-Clarion Valley SD	$182,672.00	0.0000%	$0
Allentown City SD	$9,809,104.00	2.3460%	$230,122
Alliance for Progress CS	$344,754.00	0.0000%	$0
Altoona Area SD	$2,510,073.00	2.1510%	$53,992
Ambridge Area SD	$517,155.00	3.6380%	$18,814
Annville-Cleona SD	$161,825.00	0.0000%	$0
Antietam SD	$246,284.00	7.9080%	$19,476
Antonia Pantoja Community Charter School	$504,885.00	0.0000%	$0
Apollo-Ridge SD	$248,717.00	1.6181%	$4,025
Armstrong SD	$1,472,423.00	1.7700%	$26,062
Arts Academy CS	$112,261.00	0.0000%	$0
Arts Academy Elementary Charter School	$213,285.00	0.0000%	$0
ASPIRA Bilingual Cyber Charter School	$263,746.00	0.0000%	$0
Athens Area SD	$495,673.00	1.2020%	$5,958
Austin Area SD	$36,901.00	0.0000%	$0
Avella Area SD	$69,193.00	1.0755%	$744
Avon Grove CS	$156,846.00	0.0000%	$0

Avon Grove SD	$187,418.00	0.3920%	$735
Avonworth SD	$60,379.00	2.3261%	$1,404
Baden Academy CS	$166,873.00	0.0000%	$0
Bald Eagle Area SD	$229,752.00	0.0000%	$0
Baldwin-Whitehall SD	$505,960.00	4.1200%	$20,846
Bangor Area SD	$319,979.00	1.2881%	$4,122
Bear Creek Community CS	$183,060.00	0.0000%	$0
Beaver Area SD	$184,550.00	3.7970%	$7,007
Bedford Area SD	$371,466.00	0.0000%	$0
Belle Vernon Area SD	$428,372.00	1.9130%	$8,195
Bellefonte Area SD	$344,164.00	4.0825%	$14,050
Bellwood-Antis SD	$143,553.00	0.0000%	$0
Belmont Charter School	$755,808.00	0.0000%	$0
Bensalem Township SD	$1,294,633.00	1.1960%	$15,484
Benton Area SD	$123,221.00	0.0000%	$0
Bentworth SD	$186,278.00	1.3451%	$2,506
Berlin Brothersvalley SD	$179,843.00	0.0000%	$0
Bermudian Springs SD	$214,010.00	0.8701%	$1,862
Berwick Area SD	$719,950.00	2.1129%	$15,212
Bethel Park SD	$192,212.00	7.0058%	$13,466
Bethlehem Area SD	$3,218,394.00	1.8300%	$58,896
Bethlehem-Center SD	$197,862.00	0.3400%	$673
Big Beaver Falls Area SD	$814,179.00	1.5540%	$12,652
Big Spring SD	$386,952.00	0.6520%	$2,523
Blackhawk SD	$228,582.00	2.9130%	$6,659
Blacklick Valley SD	$301,348.00	6.0189%	$18,138
Blairsville-Saltsburg SD	$346,311.00	0.2511%	$870
Bloomsburg Area SD	$335,358.00	0.3590%	$1,204
Blue Mountain SD	$264,486.00	0.0000%	$0
Blue Ridge SD	$229,433.00	0.3950%	$906
Boyertown Area SD	$534,475.00	0.4440%	$2,373
Boys Latin of Philadelphia CS	$570,821.00	0.0000%	$0
Bradford Area SD	$974,704.00	0.4053%	$3,951
Brandywine Heights Area SD	$163,710.00	0.0000%	$0
Brentwood Borough SD	$188,981.00	2.2150%	$4,186
Bristol Borough SD	$371,988.00	1.6360%	$6,086
Bristol Township SD	$1,362,131.00	5.3090%	$72,315

Brockway Area SD	$193,949.00	1.6131%	$3,129
Brookville Area SD	$330,557.00	0.0000%	$0
Brownsville Area SD	$605,976.00	1.3331%	$8,078
Bryn Athyn SD	$17,673.00	0.0000%	$0
Burgettstown Area SD	$161,567.00	0.0000%	$0
Burrell SD	$162,427.00	1.0854%	$1,763
Butler Area SD	$1,318,431.00	7.0710%	$93,226
California Area SD	$139,238.00	1.1492%	$1,600
Cambria Heights SD	$205,568.00	7.3090%	$15,025
Cameron County SD	$159,825.00	0.5880%	$940
Camp Hill SD	$81,855.00	4.8395%	$3,961
Canon-McMillan SD	$328,078.00	5.9949%	$19,668
Canton Area SD	$308,429.00	0.0000%	$0
Carbondale Area SD	$629,788.00	0.1620%	$1,020
Carlisle Area SD	$763,914.00	2.2152%	$16,922
Carlynton SD	$458,167.00	3.0660%	$14,047
Carmichaels Area SD	$322,198.00	0.0000%	$0
Catasauqua Area SD	$511,707.00	0.5619%	$2,876
Centennial SD	$552,035.00	0.8991%	$4,963
Center for Student Learning CS at Pennsbury	$20,430.00	0.0000%	$0
Central Bucks SD	$933,573.00	0.8030%	$7,496
Central Cambria SD	$305,360.00	4.2550%	$12,993
Central Columbia SD	$205,325.00	3.2491%	$6,671
Central Dauphin SD	$1,577,243.00	3.1920%	$50,346
Central Fulton SD	$188,017.00	0.0000%	$0
Central Greene SD	$344,409.00	0.0000%	$0
Central PA Digital Learning Foundation CS	$27,185.00	0.0000%	$0
Central Valley SD	$263,396.00	3.2048%	$8,441
Central York SD	$586,413.00	1.0109%	$5,928
Chambersburg Area SD	$1,903,893.00	0.6380%	$12,147
Charleroi SD	$418,787.00	2.1079%	$8,828
Charter High School for Architecture and Design	$426,938.00	0.0000%	$0
Chartiers Valley SD	$292,307.00	4.9459%	$14,457
Chartiers-Houston SD	$129,634.00	2.1279%	$2,758
Cheltenham SD	$387,882.00	3.3812%	$13,115
Chester Charter Scholars Academy CS	$307,691.00	0.0000%	$0
Chester Community CS	$2,516,446.00	0.0000%	$0

Chester-Upland SD	$2,383,903.00	8.0898%	$192,852
Chestnut Ridge SD	$316,133.00	0.0000%	$0
Chichester SD	$737,769.00	1.1350%	$8,374
Christopher Columbus CS	$642,409.00	0.0000%	$0
Circle of Seasons Charter School	$51,803.00	0.0000%	$0
City CHS	$217,488.00	0.0000%	$0
Clairton City SD	$533,425.00	1.6040%	$8,556
Clarion Area SD	$288,404.00	1.3640%	$3,934
Clarion-Limestone Area SD	$225,687.00	1.1860%	$2,677
Claysburg-Kimmel SD	$287,112.00	0.0000%	$0
Clearfield Area SD	$671,687.00	3.4480%	$23,160
Coatesville Area SD	$1,346,239.00	3.5470%	$47,751
Cocalico SD	$343,513.00	2.0789%	$7,141
Collegium CS	$351,955.00	0.0000%	$0
Colonial SD	$358,877.00	0.0000%	$0
Columbia Borough SD	$589,763.00	6.5689%	$38,741
Commodore Perry SD	$179,778.00	0.6579%	$1,183
Commonwealth Charter Academy CS	$2,518,711.00	0.0000%	$0
Community Academy of Philadelphia CS	$866,592.00	0.0000%	$0
Conemaugh Township Area SD	$121,580.00	2.1052%	$2,559
Conemaugh Valley SD	$229,515.00	1.1109%	$2,550
Conestoga Valley SD	$1,154,952.00	2.1920%	$25,316
Conewago Valley SD	$528,344.00	2.4119%	$12,743
Conneaut SD	$660,922.00	1.0680%	$7,059
Connellsville Area SD	$1,841,020.00	3.5650%	$65,633
Conrad Weiser Area SD	$566,146.00	0.0000%	$0
Cornell SD	$229,461.00	7.1646%	$16,440
Cornwall-Lebanon SD	$575,776.00	1.3829%	$7,963
Corry Area SD	$842,152.00	2.2650%	$19,075
Coudersport Area SD	$168,990.00	0.0000%	$0
Council Rock SD	$257,009.00	2.5361%	$6,518
Cranberry Area SD	$198,131.00	1.2901%	$2,556
Crawford Central SD	$932,249.00	0.9350%	$8,716
Crestwood SD	$221,784.00	1.2691%	$2,815
Crispus Attucks CS	$53,650.00	0.0000%	$0
Cumberland Valley SD	$413,962.00	1.5110%	$6,255
Curwensville Area SD	$260,946.00	0.3299%	$861

Dallas SD	$305,097.00	0.5880%	$1,794
Dallastown Area SD	$500,967.00	2.6200%	$13,125
Daniel Boone Area SD	$289,284.00	3.3900%	$9,807
Danville Area SD	$385,239.00	1.4291%	$5,505
Deep Roots Charter School	$223,558.00	0.0000%	$0
Deer Lakes SD	$153,430.00	2.0760%	$3,185
Delaware Valley SD	$479,342.00	0.0000%	$0
Derry Area SD	$419,916.00	0.6101%	$2,562
Derry Township SD	$477,076.00	2.4790%	$11,827
Discovery Charter School	$495,041.00	0.0000%	$0
Donegal SD	$583,390.00	1.9470%	$11,358
Dover Area SD	$469,812.00	0.3191%	$1,499
Downingtown Area SD	$254,339.00	1.5349%	$3,904
Dr Robert Ketterer CS Inc	$12,580.00	0.0000%	$0
Dubois Area SD	$1,095,328.00	5.9310%	$64,964
Dunmore SD	$376,548.00	1.5750%	$5,931
Duquesne City SD	$536,075.00	7.3451%	$39,375
East Allegheny SD	$537,025.00	1.3591%	$7,298
East Lycoming SD	$263,958.00	0.0000%	$0
East Penn SD	$626,664.00	4.5520%	$28,526
East Pennsboro Area SD	$345,038.00	1.3050%	$4,503
East Stroudsburg Area SD	$1,739,127.00	0.7900%	$13,739
Eastern Lancaster County SD	$686,692.00	3.1904%	$21,908
Eastern Lebanon County SD	$387,160.00	1.2620%	$4,886
Eastern York SD	$447,944.00	0.7130%	$3,194
Easton Area SD	$1,466,064.00	1.0891%	$15,967
Easton Arts Academy Elementary CS	$53,863.00	0.0000%	$0
Elizabeth Forward SD	$243,248.00	0.7810%	$1,900
Elizabethtown Area SD	$383,022.00	1.9691%	$7,542
Elk Lake SD	$222,008.00	0.0000%	$0
Ellwood City Area SD	$367,985.00	0.8061%	$2,966
Environmental Charter School at Frick Park	$239,228.00	0.0000%	$0
Ephrata Area SD	$651,907.00	3.2179%	$20,978
Erie City SD	$6,761,026.00	8.0420%	$543,722
Erie Rise Leadership Academy Charter School	$216,089.00	0.0000%	$0
Esperanza Academy Charter School	$1,115,267.00	0.0000%	$0
Esperanza Cyber CS	$235,487.00	0.0000%	$0

Eugenio Maria De Hostos CS	$356,057.00	0.0000%	$0
Everett Area SD	$294,231.00	0.0000%	$0
Executive Education Academy Charter School	$609,344.00	0.0000%	$0
Exeter Township SD	$355,585.00	1.2100%	$4,303
Fairfield Area SD	$102,066.00	3.6590%	$3,735
Fairview SD	$113,973.00	5.5562%	$6,333
Fannett-Metal SD	$244,172.00	0.0000%	$0
Farrell Area SD	$547,497.00	2.7780%	$15,209
Fell CS	$48,947.00	0.0000%	$0
Ferndale Area SD	$248,305.00	5.5938%	$13,890
First Philadelphia Preparatory Charter School	$1,341,334.00	0.0000%	$0
Fleetwood Area SD	$313,881.00	2.6869%	$8,434
Folk Arts-Cultural Treasures CS	$359,824.00	0.0000%	$0
Forbes Road SD	$60,210.00	0.0000%	$0
Forest Area SD	$138,191.00	0.0000%	$0
Forest City Regional SD	$187,215.00	0.0000%	$0
Forest Hills SD	$390,269.00	0.2110%	$823
Fort Cherry SD	$121,624.00	0.4410%	$536
Fort LeBoeuf SD	$386,535.00	3.1850%	$12,311
Fox Chapel Area SD	$348,519.00	3.2060%	$11,174
Franklin Area SD	$506,545.00	1.0822%	$5,482
Franklin Regional SD	$171,089.00	3.7041%	$6,337
Franklin Towne Charter Elementary School	$672,550.00	0.0000%	$0
Franklin Towne CHS	$859,056.00	0.0000%	$0
Frazier SD	$233,517.00	0.0000%	$0
Frederick Douglass Mastery Charter School	$512,421.00	0.0000%	$0
Freedom Area SD	$246,971.00	2.5740%	$6,357
Freeport Area SD	$147,904.00	1.6672%	$2,466
Freire CS	$709,523.00	0.0000%	$0
Galeton Area SD	$106,684.00	0.0000%	$0
Garnet Valley SD	$122,491.00	1.4082%	$1,725
Gateway SD	$590,703.00	2.5461%	$15,040
General McLane SD	$269,750.00	0.6830%	$1,842
Gettysburg Area SD	$678,597.00	2.1980%	$14,916
Gettysburg Montessori Charter School	$24,462.00	0.0000%	$0
Gillingham Charter School	$51,950.00	0.0000%	$0
Girard SD	$458,793.00	1.2949%	$5,941

Glendale SD	$143,619.00	0.0000%	$0
Global Leadership Academy CS	$483,972.00	0.0000%	$0
Global Leadership Academy CS Southwest at Huey	$444,599.00	0.0000%	$0
Governor Mifflin SD	$460,242.00	2.5120%	$11,561
Great Valley SD	$247,426.00	0.5849%	$1,447
Greater Johnstown SD	$2,225,779.00	6.6300%	$147,570
Greater Latrobe SD	$459,504.00	3.7159%	$17,075
Greater Nanticoke Area SD	$842,045.00	0.6230%	$5,246
Green Woods CS	$472,859.00	0.0000%	$0
Greencastle-Antrim SD	$270,577.00	0.4180%	$1,131
Greensburg Salem SD	$820,658.00	1.8010%	$14,780
Greenville Area SD	$480,827.00	3.5530%	$17,084
Greenwood SD	$97,669.00	1.5381%	$1,502
Grove City Area SD	$367,605.00	0.0000%	$0
Halifax Area SD	$153,337.00	0.0000%	$0
Hamburg Area SD	$363,530.00	0.2240%	$814
Hampton Township SD	$113,309.00	3.2523%	$3,685
Hanover Area SD	$552,450.00	0.5650%	$3,122
Hanover Public SD	$446,900.00	2.6460%	$11,825
Harambee Institute of Science and Technology CS	$356,609.00	0.0000%	$0
Harbor Creek SD	$214,025.00	1.9050%	$4,077
Harmony Area SD	$100,932.00	0.0000%	$0
Harrisburg City SD	$4,767,579.00	4.4204%	$210,746
Hatboro-Horsham SD	$329,280.00	0.2021%	$666
Haverford Township SD	$160,881.00	6.2798%	$10,103
Hazleton Area SD	$3,674,333.00	1.2750%	$46,847
Hempfield Area SD	$591,589.00	1.7111%	$10,122
Hempfield SD	$707,135.00	1.2720%	$8,995
Hermitage SD	$309,244.00	0.2149%	$665
Highlands SD	$682,789.00	2.9670%	$20,259
Hollidaysburg Area SD	$492,129.00	2.8649%	$14,099
Homer-Center SD	$152,005.00	1.1411%	$1,735
HOPE for Hyndman CS	$33,439.00	0.0000%	$0
Hopewell Area SD	$216,204.00	1.8751%	$4,054
Howard Gardner Multiple Intelligence CS	$78,216.00	0.0000%	$0
Huntingdon Area SD	$504,956.00	0.0000%	$0
I-LEAD Charter School	$311,436.00	0.0000%	$0

Imhotep Institute CHS	$421,994.00	0.0000%	$0
Independence CS	$582,124.00	0.0000%	$0
Independence CS West	$371,128.00	0.0000%	$0
Indiana Area SD	$391,602.00	4.0230%	$15,754
Innovative Arts Academy CS	$316,979.00	0.0000%	$0
Inquiry Charter School	$173,319.00	0.0000%	$0
Insight PA Cyber CS	$492,071.00	0.0000%	$0
Interboro SD	$441,832.00	0.3029%	$1,338
Iroquois SD	$263,290.00	1.3640%	$3,591
Jamestown Area SD	$148,143.00	5.6153%	$8,319
Jeannette City SD	$414,052.00	0.9570%	$3,963
Jefferson-Morgan SD	$203,263.00	0.0000%	$0
Jenkintown SD	$66,042.00	0.0000%	$0
Jersey Shore Area SD	$399,044.00	1.3621%	$5,435
Jim Thorpe Area SD	$395,218.00	0.3810%	$1,506
John B Stetson Charter School	$669,424.00	0.0000%	$0
Johnsonburg Area SD	$120,090.00	1.1830%	$1,421
Juniata County SD	$698,365.00	3.7313%	$26,058
Juniata Valley SD	$137,342.00	0.0000%	$0
Kane Area SD	$311,019.00	0.0000%	$0
Karns City Area SD	$210,168.00	1.6291%	$3,424
Kennett Consolidated SD	$484,452.00	0.1160%	$562
Keystone Academy Charter School	$486,045.00	0.0000%	$0
Keystone Central SD	$1,206,952.00	2.0260%	$24,453
Keystone Education Center CS	$60,744.00	0.0000%	$0
Keystone Oaks SD	$424,500.00	7.1209%	$30,228
Keystone SD	$209,516.00	0.0000%	$0
KIPP DuBois Charter School	$369,244.00	0.0000%	$0
KIPP North Philadelphia CS	$224,043.00	0.0000%	$0
KIPP Philadelphia Charter School	$608,499.00	0.0000%	$0
KIPP West Philadelphia CS	$280,065.00	0.0000%	$0
KIPP West Philadelphia Preparatory Charter School	$254,326.00	0.0000%	$0
Kiski Area SD	$607,894.00	2.1980%	$13,362
Kutztown Area SD	$194,406.00	0.4952%	$963
La Academia Partnership Charter School	$81,388.00	0.0000%	$0
Laboratory CS	$394,256.00	0.0000%	$0
Lackawanna Trail SD	$184,582.00	0.0000%	$0

Lakeland SD	$196,233.00	0.0000%	$0
Lake-Lehman SD	$221,856.00	0.0000%	$0
Lakeview SD	$355,816.00	0.0000%	$0
Lampeter-Strasburg SD	$332,071.00	5.6309%	$18,699
Lancaster SD	$5,172,788.00	3.6980%	$191,289
Laurel Highlands SD	$929,138.00	1.7140%	$15,926
Laurel SD	$139,567.00	1.2270%	$1,712
Lebanon SD	$2,205,838.00	0.8510%	$18,772
Leechburg Area SD	$172,088.00	2.9849%	$5,137
Lehigh Valley Academy Regional CS	$506,884.00	0.0000%	$0
Lehigh Valley Charter High School for the Arts	$98,581.00	0.0000%	$0
Lehigh Valley Dual Language Charter School	$187,161.00	0.0000%	$0
Lehighton Area SD	$474,000.00	0.8469%	$4,014
Lewisburg Area SD	$226,032.00	0.0000%	$0
Ligonier Valley SD	$231,425.00	0.6129%	$1,418
Lincoln CS	$391,457.00	0.0000%	$0
Lincoln Leadership Academy Charter School	$348,037.00	0.0000%	$0
Lincoln Park Performing Arts CS	$113,553.00	0.0000%	$0
Lindley Academy CS at Birney	$527,490.00	0.0000%	$0
Line Mountain SD	$289,283.00	0.0000%	$0
Littlestown Area SD	$210,401.00	3.1791%	$6,689
Lower Dauphin SD	$365,894.00	1.2321%	$4,508
Lower Merion SD	$248,998.00	3.7971%	$9,455
Lower Moreland Township SD	$79,831.00	1.5999%	$1,277
Loyalsock Township SD	$223,885.00	0.0000%	$0
Mahanoy Area SD	$341,490.00	4.2081%	$14,370
Manchester Academic CS	$144,190.00	0.0000%	$0
Manheim Central SD	$381,370.00	5.6011%	$21,361
Manheim Township SD	$465,295.00	2.1920%	$10,199
Mariana Bracetti Academy CS	$859,056.00	0.0000%	$0
Marion Center Area SD	$613,259.00	1.9722%	$12,095
Maritime Academy Charter School	$580,240.00	0.0000%	$0
Marple Newtown SD	$239,409.00	3.9330%	$9,416
Mars Area SD	$142,281.00	9.3748%	$13,339
MAST Community CS	$943,951.00	0.0000%	$0
MaST Community CS II	$695,226.00	0.0000%	$0
MaST Community CS III	$655,549.00	0.0000%	$0

Mastery CHS-Lenfest Campus	$412,573.00	0.0000%	$0
Mastery CS John Wister Elementary	$369,244.00	0.0000%	$0
Mastery CS-Cleveland Elementary	$527,490.00	0.0000%	$0
Mastery CS-Clymer Elementary	$414,457.00	0.0000%	$0
Mastery CS-Francis D. Pastorius Elementary	$427,645.00	0.0000%	$0
Mastery CS-Gratz Campus	$1,041,714.00	0.0000%	$0
Mastery CS-Hardy Williams	$862,583.00	0.0000%	$0
Mastery CS-Harrity Campus	$591,543.00	0.0000%	$0
Mastery CS-Mann Campus	$391,850.00	0.0000%	$0
Mastery CS-Pickett Campus	$640,525.00	0.0000%	$0
Mastery CS-Shoemaker Campus	$539,356.00	0.0000%	$0
Mastery CS-Smedley Campus	$565,169.00	0.0000%	$0
Mastery CS-Thomas Campus	$941,948.00	0.0000%	$0
Mastery Prep Elementary CS	$245,709.00	0.0000%	$0
Math Civics and Sciences CS	$715,881.00	0.0000%	$0
McGuffey SD	$173,942.00	0.3560%	$619
McKeesport Area SD	$1,891,316.00	4.1240%	$77,998
Mechanicsburg Area SD	$386,021.00	1.5600%	$6,022
Memphis Street Academy CS @ JP Jones	$564,554.00	0.0000%	$0
Mercer Area SD	$306,279.00	0.0000%	$0
Methacton SD	$193,463.00	1.3700%	$2,650
Meyersdale Area SD	$354,536.00	0.0000%	$0
Mid Valley SD	$486,487.00	1.0810%	$5,259
Middletown Area SD	$452,342.00	0.8650%	$3,913
Midd-West SD	$640,917.00	1.8072%	$11,583
Midland Borough SD	$153,934.00	0.0000%	$0
Mifflin County SD	$1,835,215.00	4.4540%	$81,740
Mifflinburg Area SD	$378,706.00	0.0000%	$0
Millcreek Township SD	$1,055,041.00	5.4980%	$58,007
Millersburg Area SD	$135,964.00	4.1180%	$5,599
Millville Area SD	$146,641.00	0.0000%	$0
Milton Area SD	$467,711.00	0.0000%	$0
Minersville Area SD	$239,324.00	2.8041%	$6,711
Mohawk Area SD	$259,494.00	0.0000%	$0
Monessen City SD	$289,008.00	1.8989%	$5,488
Moniteau SD	$238,832.00	0.3621%	$865
Montessori Regional CS	$213,013.00	0.0000%	$0

Montgomery Area SD	$271,166.00	0.3071%	$833
Montour SD	$310,598.00	5.3101%	$16,493
Montoursville Area SD	$238,154.00	0.8770%	$2,089
Montrose Area SD	$318,055.00	1.0102%	$3,213
Moon Area SD	$237,116.00	1.6390%	$3,886
Morrisville Borough SD	$191,117.00	2.0621%	$3,941
Moshannon Valley SD	$243,616.00	0.9089%	$2,214
Mount Carmel Area SD	$438,936.00	4.9470%	$21,714
Mount Pleasant Area SD	$310,796.00	3.0990%	$9,631
Mount Union Area SD	$479,411.00	0.0000%	$0
Mountain View SD	$187,871.00	3.0608%	$5,750
Mt Lebanon SD	$218,248.00	0.6939%	$1,514
Muhlenberg SD	$629,591.00	3.1000%	$19,517
Multicultural Academy CS	$192,158.00	0.0000%	$0
Muncy SD	$196,351.00	0.0000%	$0
Nazareth Area SD	$239,054.00	1.3449%	$3,215
Neshaminy SD	$854,142.00	0.6080%	$5,194
Neshannock Township SD	$108,449.00	1.6528%	$1,792
New Brighton Area SD	$386,718.00	0.9799%	$3,790
New Castle Area SD	$1,928,552.00	2.3322%	$44,978
New Day Charter School	$37,508.00	0.0000%	$0
New Foundations CS	$1,035,497.00	0.0000%	$0
New Hope-Solebury SD	$43,391.00	0.0000%	$0
New Kensington-Arnold SD	$1,178,516.00	6.1680%	$72,691
Newport SD	$265,214.00	0.0000%	$0
Norristown Area SD	$1,970,516.00	1.9640%	$38,701
North Allegheny SD	$137,555.00	4.9998%	$6,877
North Clarion County SD	$159,433.00	5.1556%	$8,220
North East SD	$350,436.00	3.5000%	$12,265
North Hills SD	$313,207.00	1.5149%	$4,745
North Penn SD	$984,263.00	1.1740%	$11,556
North Pocono SD	$324,519.00	0.0000%	$0
North Schuylkill SD	$358,018.00	1.6470%	$5,896
North Star SD	$268,619.00	0.0000%	$0
Northampton Area SD	$495,782.00	4.6621%	$23,114
Northeast Bradford SD	$211,038.00	1.8181%	$3,837
Northeastern York SD	$459,923.00	0.7759%	$3,569

Northern Bedford County SD	$186,348.00	0.0000%	$0
Northern Cambria SD	$221,615.00	6.1144%	$13,550
Northern Lebanon SD	$279,500.00	3.0880%	$8,631
Northern Lehigh SD	$329,372.00	1.4560%	$4,796
Northern Potter SD	$281,950.00	0.0000%	$0
Northern Tioga SD	$442,750.00	0.0000%	$0
Northern York County SD	$258,095.00	0.0000%	$0
Northgate SD	$320,019.00	3.6409%	$11,652
Northwest Area SD	$211,963.00	0.0000%	$0
Northwestern Lehigh SD	$140,456.00	0.0000%	$0
Northwestern SD	$360,151.00	0.0000%	$0
Northwood Academy CS	$555,750.00	0.0000%	$0
Norwin SD	$336,698.00	1.0041%	$3,381
Octorara Area SD	$492,182.00	0.0000%	$0
Oil City Area SD	$758,660.00	3.8514%	$29,219
Old Forge SD	$186,968.00	0.3560%	$666
Oley Valley SD	$253,938.00	1.6529%	$4,197
Olney Charter High School	$1,372,058.00	0.0000%	$0
Oswayo Valley SD	$113,462.00	0.0000%	$0
Otto-Eldred SD	$135,083.00	0.0000%	$0
Owen J Roberts SD	$194,099.00	0.4850%	$941
Oxford Area SD	$624,159.00	1.6279%	$10,161
Palisades SD	$124,151.00	0.5431%	$674
Palmerton Area SD	$266,679.00	1.4439%	$3,850
Palmyra Area SD	$253,176.00	2.0410%	$5,167
Pan American Academy CS	$533,143.00	0.0000%	$0
Panther Valley SD	$546,215.00	2.4930%	$13,617
Parkland SD	$1,166,974.00	1.5320%	$17,878
Passport Academy CS	$59,842.00	0.0000%	$0
Pen Argyl Area SD	$171,394.00	2.1509%	$3,686
Penn Cambria SD	$297,366.00	8.8890%	$26,433
Penn Hills Charter School of Entrepreneurship	$99,933.00	0.0000%	$0
Penn Hills SD	$1,152,849.00	13.4550%	$155,116
Penn Manor SD	$693,729.00	1.4300%	$9,920
Penncrest SD	$779,936.00	2.2760%	$17,752
Penn-Delco SD	$256,811.00	1.4411%	$3,701
Pennridge SD	$472,527.00	1.8830%	$8,898

Penns Manor Area SD	$279,701.00	2.1619%	$6,047
Penns Valley Area SD	$546,478.00	1.3721%	$7,498
Pennsbury SD	$685,077.00	0.5400%	$3,700
Pennsylvania Cyber CS	$2,316,518.00	0.0000%	$0
Pennsylvania Distance Learning CS	$213,815.00	0.0000%	$0
Pennsylvania Leadership Charter School	$524,341.00	0.0000%	$0
Pennsylvania Virtual CS	$557,495.00	0.0000%	$0
Penn-Trafford SD	$258,579.00	0.6160%	$1,593
People for People CS	$384,314.00	0.0000%	$0
Pequea Valley SD	$802,531.00	8.1030%	$65,029
Perkiomen Valley SD	$227,263.00	0.8359%	$1,900
Perseus House CS of Excellence	$275,963.00	0.0000%	$0
Peters Township SD	$97,338.00	18.0854%	$17,604
Philadelphia Academy CS	$779,613.00	0.0000%	$0
Philadelphia City SD	$116,528,467.00	9.8410%	$11,467,567
Philadelphia Electrical & Tech CHS	$425,761.00	0.0000%	$0
Philadelphia Hebrew Public CS	$116,232.00	0.0000%	$0
Philadelphia Montessori CS	$126,077.00	0.0000%	$0
Philadelphia Performing Arts CS	$1,738,836.00	0.0000%	$0
Philipsburg-Osceola Area SD	$331,454.00	0.5810%	$1,926
Phoenixville Area SD	$289,284.00	1.1050%	$3,197
Pine Grove Area SD	$293,565.00	0.0000%	$0
Pine-Richland SD	$113,757.00	6.0607%	$6,894
Pittsburgh SD	$11,146,817.00	7.6610%	$853,958
Pittston Area SD	$721,200.00	1.1730%	$8,460
Pleasant Valley SD	$634,498.00	1.2700%	$8,058
Plum Borough SD	$258,579.00	7.8009%	$20,172
Pocono Mountain SD	$1,983,113.00	0.5380%	$10,669
Port Allegany SD	$282,508.00	0.0000%	$0
Portage Area SD	$211,092.00	0.2872%	$606
Pottsgrove SD	$377,648.00	1.1551%	$4,362
Pottstown SD	$1,084,349.00	0.1870%	$2,028
Pottsville Area SD	$615,442.00	3.3850%	$20,832
Premier Arts and Science Charter School	$131,616.00	0.0000%	$0
Preparatory CS of Mathematics Science Tech and Careers	$442,716.00	0.0000%	$0
Propel CS-Braddock Hills	$297,939.00	0.0000%	$0
Propel CS-East	$104,202.00	0.0000%	$0

Propel CS-Hazelwood	$115,568.00	0.0000%	$0
Propel CS-Homestead	$215,212.00	0.0000%	$0
Propel CS-McKeesport	$197,133.00	0.0000%	$0
Propel CS-Montour	$308,070.00	0.0000%	$0
Propel CS-Northside	$160,412.00	0.0000%	$0
Propel CS-Pitcairn	$96,531.00	0.0000%	$0
Provident CS	$68,296.00	0.0000%	$0
Punxsutawney Area SD	$828,070.00	2.9780%	$24,660
Purchase Line SD	$316,870.00	0.5651%	$1,791
Quaker Valley SD	$148,828.00	0.0000%	$0
Quakertown Community SD	$395,323.00	2.9181%	$11,536
Radnor Township SD	$327,420.00	0.0000%	$0
Reach Cyber CS	$728,580.00	0.0000%	$0
Reading SD	$11,638,593.00	4.3105%	$501,685
Red Lion Area SD	$755,799.00	1.0600%	$8,011
Redbank Valley SD	$269,024.00	0.0000%	$0
Renaissance Academy CS	$120,707.00	0.0000%	$0
Reynolds SD	$413,972.00	0.2340%	$969
Richard Allen Preparatory CS	$336,511.00	0.0000%	$0
Richland SD	$229,094.00	3.9150%	$8,969
Ridgway Area SD	$148,757.00	11.5702%	$17,212
Ridley SD	$603,682.00	0.8580%	$5,180
Ringgold SD	$549,607.00	5.1461%	$28,283
Riverside Beaver County SD	$208,025.00	0.3767%	$784
Riverside SD	$323,316.00	0.4021%	$1,300
Riverview SD	$152,143.00	0.0000%	$0
Robert Benjamin Wiley Community CS	$217,494.00	0.0000%	$0
Roberto Clemente CS	$350,379.00	0.0000%	$0
Rochester Area SD	$318,152.00	1.4290%	$4,546
Rockwood Area SD	$116,403.00	1.8989%	$2,210
Rose Tree Media SD	$128,508.00	0.9291%	$1,194
Russell Byers CS	$501,116.00	0.0000%	$0
Saint Clair Area SD	$153,567.00	2.0292%	$3,116
Saint Marys Area SD	$253,007.00	13.3429%	$33,758
Salisbury Township SD	$183,244.00	1.0471%	$1,919
Salisbury-Elk Lick SD	$342,350.00	0.0000%	$0
Sankofa Freedom Academy Charter School	$461,555.00	0.0000%	$0

Saucon Valley SD	$159,059.00	0.0000%	$0
Sayre Area SD	$208,137.00	0.9041%	$1,882
School Lane CS	$352,055.00	0.0000%	$0
Schuylkill Haven Area SD	$187,750.00	0.6098%	$1,145
Schuylkill Valley SD	$230,192.00	1.6262%	$3,743
Scranton SD	$3,981,491.00	2.7023%	$107,590
Selinsgrove Area SD	$561,651.00	0.2070%	$1,163
Seneca Valley SD	$282,630.00	3.7740%	$10,667
Seven Generations Charter School	$73,876.00	0.0000%	$0
Shade-Central City SD	$78,867.00	0.3155%	$249
Shaler Area SD	$460,242.00	2.3441%	$10,788
Shamokin Area SD	$684,008.00	4.0370%	$27,613
Shanksville-Stonycreek SD	$136,205.00	0.0000%	$0
Sharon City SD	$1,011,657.00	1.7260%	$17,461
Sharpsville Area SD	$211,168.00	2.0082%	$4,241
Shenandoah Valley SD	$547,227.00	4.4971%	$24,609
Shenango Area SD	$266,552.00	1.9496%	$5,197
Shikellamy SD	$722,419.00	1.4820%	$10,706
Shippensburg Area SD	$773,907.00	0.0000%	$0
Slippery Rock Area SD	$251,424.00	0.8899%	$2,237
Smethport Area SD	$252,772.00	0.0000%	$0
Solanco SD	$1,554,200.00	1.3660%	$21,230
Somerset Area SD	$518,351.00	5.5780%	$28,914
Souderton Area SD	$361,916.00	1.6229%	$5,874
South Allegheny SD	$380,156.00	0.3880%	$1,475
South Butler County SD	$217,563.00	12.0629%	$26,245
South Eastern SD	$294,126.00	0.0000%	$0
South Fayette Township SD	$73,454.00	0.0000%	$0
South Middleton SD	$173,012.00	0.3601%	$623
South Park SD	$141,489.00	4.2169%	$5,966
South Side Area SD	$110,694.00	0.0000%	$0
South Western SD	$344,610.00	1.2271%	$4,229
South Williamsport Area SD	$270,842.00	0.0000%	$0
Southeast Delco SD	$1,406,489.00	2.0840%	$29,311
Southeastern Greene SD	$251,352.00	0.0000%	$0
Southern Columbia Area SD	$202,969.00	0.0000%	$0
Southern Fulton SD	$150,217.00	0.0000%	$0

Southern Huntingdon County SD	$216,550.00	0.0000%	$0
Southern Lehigh SD	$215,799.00	2.1831%	$4,711
Southern Tioga SD	$372,198.00	0.0000%	$0
Southern York County SD	$245,510.00	1.3509%	$3,317
Southmoreland SD	$349,311.00	0.3971%	$1,387
Southwest Leadership Academy CS	$468,934.00	0.0000%	$0
Spring Cove SD	$294,864.00	0.0000%	$0
Spring Grove Area SD	$386,314.00	0.5419%	$2,094
Springfield SD	$128,135.00	0.6128%	$785
Springfield Township SD	$210,546.00	2.1370%	$4,499
Spring-Ford Area SD	$250,364.00	0.5211%	$1,305
State College Area SD	$623,032.00	3.0580%	$19,052
Steel Valley SD	$557,161.00	5.0260%	$28,003
Steelton-Highspire SD	$624,411.00	4.1370%	$25,832
Stone Valley Community CS	$18,218.00	0.0000%	$0
Sto-Rox SD	$935,197.00	8.1501%	$76,219
Stroudsburg Area SD	$901,123.00	0.6640%	$5,983
Sugar Valley Rural CS	$105,001.00	0.0000%	$0
Sullivan County SD	$112,698.00	0.0000%	$0
Susquehanna Community SD	$178,600.00	3.8601%	$6,894
Susquehanna Township SD	$381,069.00	3.4880%	$13,292
Susquenita SD	$213,009.00	0.2959%	$630
Sylvan Heights Science CS	$119,412.00	0.0000%	$0
Tacony Academy Charter School	$776,165.00	0.0000%	$0
Tamaqua Area SD	$427,888.00	1.1799%	$5,049
TECH Freire CS	$342,869.00	0.0000%	$0
The New Academy CS	$41,798.00	0.0000%	$0
The Philadelphia CS for Arts and Sciences at HR Edmunds	$730,951.00	0.0000%	$0
Tidioute Community CS	$103,266.00	0.0000%	$0
Titusville Area SD	$857,157.00	0.0710%	$609
Towanda Area SD	$358,209.00	2.3259%	$8,332
Tredyffrin-Easttown SD	$194,657.00	0.0000%	$0
Trinity Area SD	$431,304.00	0.0000%	$0
Tri-Valley SD	$89,613.00	0.0000%	$0
Troy Area SD	$256,102.00	0.0000%	$0
Tulpehocken Area SD	$296,480.00	0.6909%	$2,049
Tunkhannock Area SD	$431,925.00	0.0000%	$0

Turkeyfoot Valley Area SD	$88,134.00	1.9234%	$1,695
Tuscarora SD	$312,537.00	2.2561%	$7,051
Tussey Mountain SD	$222,214.00	0.0000%	$0
Twin Valley SD	$440,176.00	2.4390%	$10,736
Tyrone Area SD	$395,816.00	3.2091%	$12,702
Union Area SD	$191,515.00	1.4601%	$2,796
Union City Area SD	$323,930.00	0.0000%	$0
Union SD	$146,391.00	0.0000%	$0
Uniontown Area SD	$1,215,103.00	3.2280%	$39,223
Unionville-Chadds Ford SD	$82,072.00	0.0000%	$0
United SD	$313,968.00	2.4141%	$7,579
Universal Alcorn CS	$425,761.00	0.0000%	$0
Universal Audenried Charter School	$421,390.00	0.0000%	$0
Universal Bluford Charter School	$376,779.00	0.0000%	$0
Universal Creighton Charter School	$551,982.00	0.0000%	$0
Universal Daroff Charter School	$535,026.00	0.0000%	$0
Universal Institute CS	$463,438.00	0.0000%	$0
Universal Vare Charter School	$251,690.00	0.0000%	$0
Upper Adams SD	$211,816.00	0.9900%	$2,097
Upper Darby SD	$3,924,351.00	2.5370%	$99,561
Upper Dauphin Area SD	$324,971.00	0.2889%	$939
Upper Dublin SD	$144,321.00	0.0000%	$0
Upper Merion Area SD	$340,443.00	0.2480%	$844
Upper Moreland Township SD	$259,007.00	1.0830%	$2,805
Upper Perkiomen SD	$238,934.00	0.9931%	$2,373
Upper Saint Clair SD	$61,415.00	9.0909%	$5,583
Urban Academy of Greater Pittsburgh CS	$102,571.00	0.0000%	$0
Urban Pathways 6-12 CS	$131,432.00	0.0000%	$0
Urban Pathways K-5 College Charter School	$115,679.00	0.0000%	$0
Valley Grove SD	$158,787.00	0.6849%	$1,088
Valley View SD	$330,122.00	0.8110%	$2,677
Vida Charter School	$34,736.00	0.0000%	$0
Vision Academy Charter School	$93,367.00	0.0000%	$0
Wallenpaupack Area SD	$508,279.00	0.0000%	$0
Wallingford-Swarthmore SD	$187,363.00	0.8472%	$1,587
Warren County SD	$1,426,059.00	2.2360%	$31,887
Warrior Run SD	$393,764.00	0.0000%	$0

Warwick SD	$411,521.00	2.0723%	$8,528
Washington SD	$637,206.00	2.1540%	$13,725
Wattsburg Area SD	$239,368.00	3.1960%	$7,650
Wayne Highlands SD	$648,559.00	0.0000%	$0
Waynesboro Area SD	$636,604.00	1.4120%	$8,989
Weatherly Area SD	$140,764.00	0.9618%	$1,354
Wellsboro Area SD	$329,061.00	0.0000%	$0
West Allegheny SD	$207,065.00	0.7941%	$1,644
West Branch Area SD	$321,848.00	0.4520%	$1,455
West Chester Area SD	$491,818.00	4.4010%	$21,645
West Greene SD	$162,512.00	0.0000%	$0
West Jefferson Hills SD	$131,968.00	0.6902%	$911
West Middlesex Area SD	$252,690.00	1.7540%	$4,432
West Mifflin Area SD	$571,338.00	3.2950%	$18,826
West Oak Lane CS	$732,836.00	0.0000%	$0
West Perry SD	$392,222.00	1.0200%	$4,001
West Phila. Achievement CES	$447,363.00	0.0000%	$0
West Shore SD	$1,011,358.00	1.2780%	$12,925
West York Area SD	$439,482.00	1.8909%	$8,310
Western Beaver County SD	$80,385.00	3.5902%	$2,886
Western Wayne SD	$349,148.00	0.0000%	$0
Westinghouse Arts Academy CS	$26,670.00	0.0000%	$0
Westmont Hilltop SD	$194,015.00	2.2081%	$4,284
Whitehall-Coplay SD	$814,494.00	3.9290%	$32,001
Widener Partnership CS	$251,480.00	0.0000%	$0
Wilkes-Barre Area SD	$3,292,685.00	1.9210%	$63,252
Wilkinsburg Borough SD	$1,048,675.00	11.0200%	$115,564
William Penn SD	$1,862,620.00	3.4410%	$64,093
Williams Valley SD	$183,617.00	0.0000%	$0
Williamsburg Community SD	$106,881.00	0.0000%	$0
Williamsport Area SD	$2,014,910.00	1.0990%	$22,144
Wilmington Area SD	$413,689.00	0.4001%	$1,655
Wilson Area SD	$347,473.00	1.1560%	$4,017
Wilson SD	$547,170.00	1.3459%	$7,365
Windber Area SD	$355,011.00	1.0140%	$3,600
Wissahickon CS	$685,738.00	0.0000%	$0
Wissahickon SD	$257,825.00	0.5211%	$1,344

Woodland Hills SD	$1,579,532.00	4.6550%	$73,528
Wyalusing Area SD	$227,843.00	2.1921%	$4,995
Wyoming Area SD	$469,263.00	1.5990%	$7,503
Wyoming Valley West SD	$1,512,701.00	0.5700%	$8,623
Wyomissing Area SD	$220,451.00	2.2992%	$5,069
York Academy Regional Charter School	$368,935.00	0.0000%	$0
York City SD	$3,890,242.00	2.9170%	$113,479
York Suburban SD	$294,126.00	0.0000%	$0
Yough SD	$314,639.00	0.9049%	$2,847
Young Scholars CS	$201,576.00	0.0000%	$0
Young Scholars of Central PA CS	$37,901.00	0.0000%	$0
Young Scholars of McKeesport Charter School	$110,856.00	0.0000%	$0
Young Scholars of Western Pennsylvania CS	$88,734.00	0.0000%	$0