NCSEAN North Carolina State Education Assistance Authority

OPPORTUNITY SCHOLARSHIP PROCESSES AND VERIFICATIONS

SEAA has a thorough process for ensuring that Opportunity Scholarship funds are appropriately distributed which includes a multi-step verification process before funds are distributed. SEAA relies on the statutorily required notifications from Division of Non-Public Education in the Department of Administration for a school's authority to operate in NC and when a school is no longer authorized to operate in the State.

PROCESS FOR BECOMING AN OPPORTUNITY SCHOLARSHIP PARTICIPATING SCHOOL

Approval by the Division of Non-Public Education (DNPE)

- DNPE, housed in the Department of Administration, is required to register and monitor private schools operating in the State.
- A school is not eligible to receive Opportunity Scholarship funds on behalf of eligible students until the school is registered with and approved by DNPE to operate in the State.
- DNPE is required by statute to provide a list of approved schools to SEAA and must notify SEAA within five business days of a school becoming ineligible to operate in the State.

Approval by SEAA as an Opportunity Scholarship Participating School

- All schools participating in the Opportunity Scholarship program **must sign a participation agreement** with SEAA which includes, among other things, agreeing to:
 - Submit its tuition and fee policies and schedules on an annual basis;
 - Submit a criminal history check for its staff member with the highest-decision making authority (HDMA). A criminal history check is required to be submitted prior to the initial school registration process, when there is a change to the HDMA, and every three years thereafter. SEAA reviews the criminal history check submitted by the HDMA to determine that he or she has financial integrity and does not pose a threat to the physical safety of students or personnel at the school. For additional information see OSP Rule .0404 entitled "Review of the School's Criminal History Check"
 - Submit a Financial Review performed by a certified public accountant licensed in North Carolina after the school's fiscal year-end, if the school has 70 or more scholarship recipients enrolled;
 - Certify that the scholarship student is enrolled in and attending the school at the beginning of each semester; and,
 - Certify that the school has correctly reported the amount of tuition charged to the student.
- Schools must also provide a Tax ID number, a W-9, a vendor form, and a voided check or bank memo.
- Only after these requirements are met is a school permitted to receive Opportunity Scholarship funds on behalf of scholarship recipients enrolled at the school.

PROCESS FOR RECEIVING OPPORTUNITY SCHOLARSHIP FUNDS

Parental Requirements

- Parents must apply to SEAA on behalf of their child using a secure application portal and provide a parent's SSN and DOB and the student's SSN and DOB.
- Parents qualifying for a scholarship choose and enroll their child in an approved Opportunity Scholarship participating school. The parents, not the schools, control the school choice.
- Schools are not able to add students to their rosters or change a student's enrollment information.
- Parents are not permitted to designate anyone associated with the school to endorse the scholarship.

SEAA Verification Process

- SEAA verifies that schools are registered with and approved by DNPE before enrollment in the Opportunity Scholarship Program.
 - SEAA requests an updated copy of the DNPE registered school list on a regular basis.
 - o If necessary, SEAA reaches out to DNPE to verify school registration.
- SEAA verifies that parents meet all statutory <u>eligibility requirements</u>. SEAA also verifies students in certain eligibility categories against government databases, including the
 - Department of Public Instruction database for students entering grades 3-12 who are eligible because of prior public enrollment status (students in K-2 are not required to have previously attended a NC public school); and
 - Department of Health and Human Services' database for students who are eligible due to foster care status.
- Once a student is enrolled, each semester SEAA ensures that:
 - o The school certifies that the student is enrolled.
 - The parent verifies the student's enrollment.
- SEAA disburses Opportunity Scholarship funds to the school only after both the parents and the school have separately verified the student's enrollment each semester.

Why does it appear that some schools received more Opportunity Scholarship grants than total students enrolled?

- **DNPE** data is reflective of the schools and **enrollment** at a **point** in time. New private schools are required by law to notify DNPE of an intent to operate, and private schools are required by law to notify DNPE when the school terminates operation. DNPE is required to report annually by July 15th to the General Assembly on the total number of schools and total enrollment by grade statewide and by county. However, this data is a "snapshot" and does not account for variations in the number of schools or enrollment over the course of a year.
- SEAA works with Opportunity Scholarship schools and families attending those schools throughout the year; therefore, SEAA data is continually updated and not simply a point in time. For example, students, both Opportunity Scholarship recipients and other students, transfer into and out of schools during the school year. Enrollment can vary from semester-to-semester or even within the same semester.
- Researchers have previously encountered challenges when attempting to compare the data housed at DNPE and SEAA. There are differences in the timing and manner that the data is collected and presented. These obstacles make it **difficult to accurately reconcile datasets** from the two agencies.

What is the process when an Opportunity Scholarship school becomes ineligible to operate or closes?

- DNPE is required by statute to notify SEAA within five business days of a school becoming ineligible to operate, including school closures.
- Once SEAA determines that a school is no longer eligible to operate in the State, SEAA can assist students in
 transferring to another eligible school to use the available scholarship funds. If a school closes or is deemed
 ineligible by DNPE to operate in the State during a school year, the amount of scholarship funds that is
 available for a student to use at another school would be calculated based on the last date the student was
 able to attend classes at the school and in accordance with SEAA's K12 Programs' Return of Funds Policy.