

GaDOE

Title I, Part A – Equitable Services Pooling Across LEAs

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Title I, Part Pooling Across LEAs



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Title I, Part A Pooling Across LEAs

- Takes advantage of flexibility which allows pooling across LEAs under federal law and non-regulatory guidance
- Streamlines administration for public and nonpublic schools
- Leverages purchasing power for supplemental supports
- Customizes supports for most at-risk students

Title I, Part A Statute

1117(b)(1)(J)

(b) CONSULTATION.—

(1) IN GENERAL.—To ensure timely and meaningful consultation, a local educational agency shall consult with appropriate private school officials during the design and development of such agency’s programs under this part. Such agency and private school officials shall both have the goal of reaching agreement on how to provide equitable and effective programs for eligible private school children, the results of which agreement shall be transmitted to the ombudsman designated under subsection (a)(3)(B). Such process shall include consultation on issues such as—

(J) whether to provide equitable services to eligible private school children—

(i) by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(A) based on all the children from low-income families in a participating school attendance area who attend private schools; or

(ii) in the agency’s participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(A) based on the number of children from low-income families who attend private schools;

2019 Non-Regulatory Guidance

B-8. What are the options available for providing equitable services to private school children?

Consistent with ESEA section 1117(b)(1)(J), following consultation with, and the agreement of, private school officials (see B-9), an LEA may choose one or more of the following options for providing equitable services to eligible private school children with Title I funds:

1. School-by-School
2. Pooling within an LEA

3. Pooling across LEAs

2019 Non-Regulatory Guidance

3. Pooling across LEAs:

Because eligibility for Title I services is based on a child's residence and not where the child attends school, it is **common that multiple LEAs have a responsibility to provide services to eligible children who attend the same private school, making provision of those services through pooling across LEAs potentially more educationally effective and efficient than by each individual LEA providing services to eligible students in the same private school.** Thus, multiple LEAs may pool the Title I funds generated by their private school children from low-income families who reside in a participating Title I public school attendance area to serve eligible low-achieving private school children who reside in those LEAs.

In other words, low-achieving private school children in greatest need who reside in a participating Title I public school attendance area in any of the applicable LEAs may be served with the pooled funds.

The LEAs, in consultation with appropriate private school officials, must establish criteria to determine the eligible private school students in greatest educational need to receive services.

Implementation of Pooling in GA

	LEA A	LEA B	LEA C	TOTAL
Private School 1	\$50,000		\$10,000	\$60,000
Private School 2	\$25,000	\$1,000		\$26,000
TOTAL	\$75,000	\$1,000	\$10,000	

- Currently in GA LEAs and Private Schools are implementing equitable services under Title I, Part A in an LEA-by-LEA and school-by-school scenario.
- While there are a number of variations of pooling, in FY22 GaDOE is rolling out the implantation of pooling for a single private school across LEAs.

This slide has been updated since the original webinar on 08.12.20.

Generated and Expended Title I, Part A Funds and the Impact of Pooling

How Funds are Generated

- Students reside in Title I school attendance zone
- Students meet poverty criteria
 1. The same measure of poverty used to count public school children
 2. Comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable
 3. Comparable poverty data from a different source
 4. Proportionality
 5. An equated measure

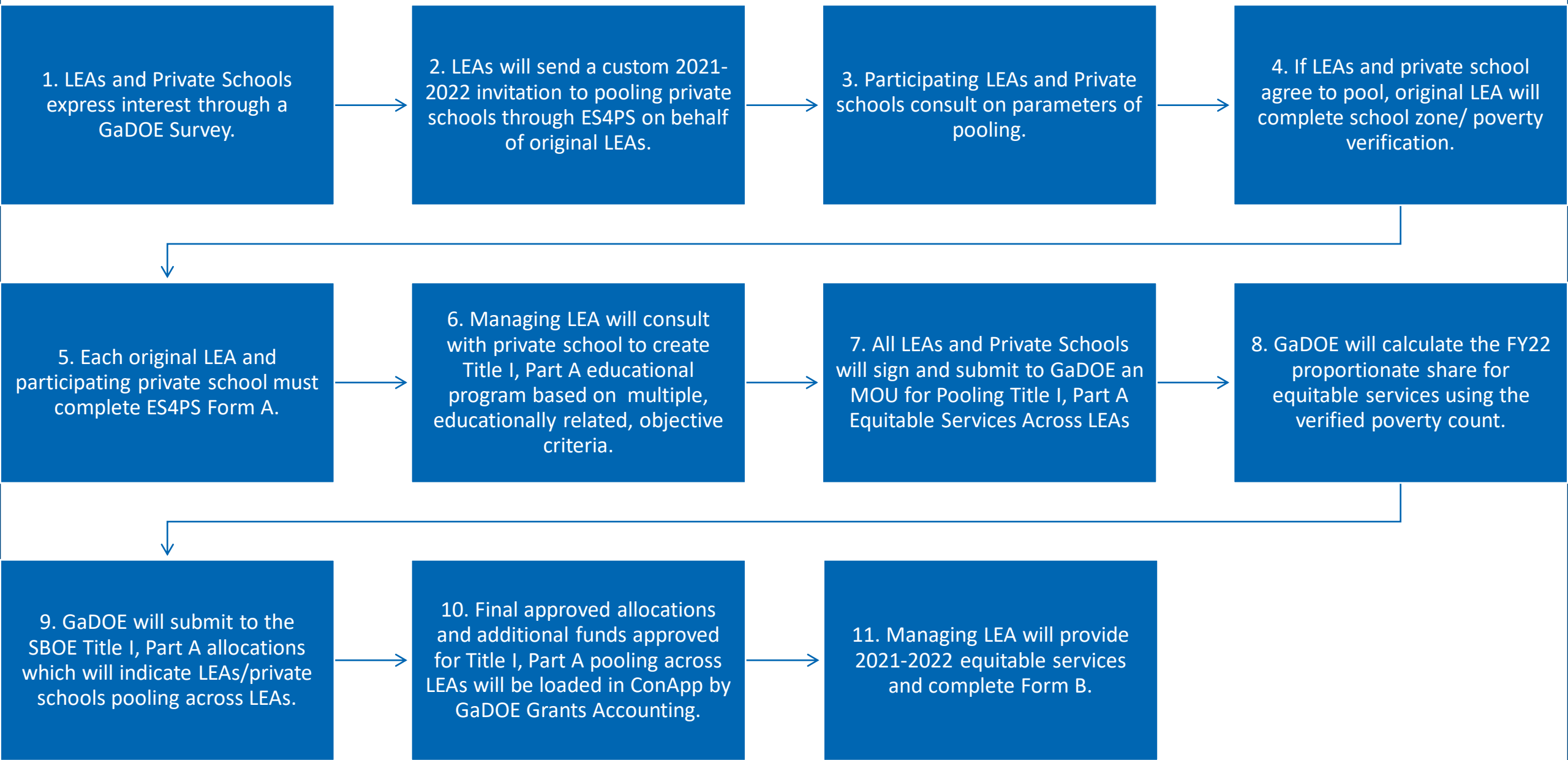
How Funds are Expended

- Students reside in Title I school attendance zone
- Students are identified as lowest achieving on multiple, educationally related, objective criteria

*Does **not** have to meet poverty criteria*

Applied to Pooling:

The private school will rank order all eligible students from pooling LEAs and serve the lowest achieving with the pooled funds.



Georgia FY21 Data

Data used strictly for illustrating pooling process. FY22 pooling will be based on 2021-2022 Form A participation and Fall 2020 Data.

Before Pooling

#LEAs providing Title I, Part A Equitable Services	30
#LEAs providing equitable services to private schools served by more than one LEA	24
# private schools participating in Title I, Part A equitable services	77
# private schools served by more than one LEA	24

After 100% Pooling

#LEAs providing Title I, Part A Equitable Services	22
#LEAs providing equitable services to private schools served by more than one LEA	0
# private schools participating in Title I, Part A equitable services	77
# private schools served by more than one LEA	0

Based on ES4PS Form Data from 06.30.2020

Georgia FY21 Data – Example

Streamlining for Private Schools

Dar-Un-Noor Before Pooling

LEA	Title I, Part A
Atlanta	\$11,345
Clayton	\$2,427
Cobb	\$9,368
DeKalb	\$2,544
Gwinnett	\$3,741

Dar-Un-Noor After 100% Pooling

LEA	Title I, Part A
Atlanta	\$29,425

FY21 Data on this slide is subject to further review and updates.

Georgia FY21 Data – Example

Streamlining for LEAs

Sample of Metro LEAs	Before Pooling	After 100% Pooling
DeKalb	29	19
Clayton	11	2
Atlanta	11	9
Fulton	8	3
Gwinnett	7	4
Cobb	4	1

FY21 Data on this slide is subject to further review and updates.

Metro Atlanta Schools/LEAs Impacted

		Before	11	1	0	11	4	29	0	8	7	2	2
		After	9	0	2	2	1	19	2	3	4	2	1
SchoolName	Geographic Loc.	#LEAs	APS	Cherokee	CSD	Clayton	Cobb	DeKalb	Fayette	Fulton	Gwinnett	Henry	Rockdale
Light of the World Christian Academy(1202)	APS	2				x		x					
Atlanta Youth Academy(843)	APS	3	x					x		x			
Berean Christian Jr. Academy(55)	APS	3	x				x	x					
St. John the Evangelist(563)	APS	4	x			x				x		x	
Dar-Un-Noor Academy(976)	APS	5	x			x	x	x			x		
St. Catherine of Siena Catholic(555)	Cobb	2		x			x						
Saint Thomas More Catholic School(518)	CSD	2	x					x					
Camp Jewell House(1194)	DeKalb	2				x		x					
Immaculate Heart of Mary(321)	DeKalb	2						x			x		
St. Peter Regional Catholic School(577)	DeKalb	2				x		x					
Torah Day School of Atlanta(609)	DeKalb	2						x		x			
Decatur Adventist Junior Academy(173)	DeKalb	3						x			x		x
Mohammad Schools(977)	DeKalb	3	x			x		x					
Our Lady of Mercy Catholic High School(915)	Fayette	2				x				x			
Our Lady of Victory Catholic School(469)	Fayette	3				x				x		x	
CMCH Elementary & Middle School(1201)	Fulton	2						x		x			
Cristo Rey Atlanta Jesuit High School(1060)	Fulton	2	x					x					
Al-Falah Academy(1039)	Gwinnett	2						x			x		
North Henry Academy(1217)	Henry	2				x		x					

Based on ES4PS Form Data from 06.30.2020

Macon Area Schools/LEAs Impacted

		Before	3	1	1	1
		After	3	0	0	0
SchoolName	Geographic Loc.	#LEAs	Bibb	Houston	Jones	Peach
Bethany Christian Academy(1009)	Bibb	1	x			
Mount deSales Academy(412)	Bibb	1	x			
St. Peter Claver Catholic School(576)	Bibb	4	x	x	x	x

Rome Area Schools/LEAs Impacted

		Before	1	2
		After	0	2
SchoolName	Geographic Loc.	#LEAs	Floyd	Rome City
Unity Christian School(622)	Rome City	1		x
St. Mary's Catholic School(569)	Rome City	2	x	x

Based on ES4PS Form Data from 06.30.2020

Brunswick Area Schools/LEAs Impacted

		Before	3	1
		After	2	1
SchoolName ▼	Geographic Loc. ↑	#LEAs ▼	Camden ▼	Glynn ▼
St. Francis Xavier Catholic School(558)	Glynn	3	x	x

Athens Area Schools/LEAs Impacted

		Before	2	1	1
		After	2	0	0
SchoolName ▼	Geographic Loc. ↑	#LEAs ▼	Clarke ▼	Oconee ▼	Walton ▼
Downtown Academy(1024)	Clarke	1	x		
Saint Joseph Catholic Parish School(1049)	Clarke	3	x	x	x

Based on ES4PS Form Data from 06.30.2020

Albany Area Schools/LEAs Impacted

		Before	1	1	1
		After	1	0	0
SchoolName	Geographic Loc.	#LEAs	Dougherty	Lee	Terrell
St. Teresa School(580)	Dougherty	3	x	x	x

LEAs Not Impacted by Pooling*

Muscogee, Pickens, Richmond, Savannah-Chatham, Wilkinson

Private Schools Not Impacted by Pooling

If served by one LEA in whose geographic boundaries the school is located.

*Based on ES4PS Form Data from 06.30.2020. *Subject to change in FY22.*

GaDOE Survey – Pooling Interest

1. LEAs and Private Schools express interest through a GaDOE Survey.

- Pooling interest survey is available on the State Ombudsman website now. GaDOE will email survey to all 180 LEAs and 600+ private schools in Georgia by close of business Friday, August 14, 2020.
- Survey will close Friday, August 21, 2020.
- LEAs and private schools may check receipt of pooling interest survey submissions through a link posted on the State Ombudsman webpage.
- LEAs providing Title I, Part A equitable services AND participating private schools must be in agreement in order to pool.

2021-2022 ES4PS Invitations

2. LEAs will send a custom 2021-2022 invitation to pooling private schools through ES4PS on behalf of original LEAs.

- Participating LEAs should coordinate across districts to plan consultation meetings with interested private schools.
- ES4PS allows LEAs to send customized invitations to schools. LEAs should customize the invitation for schools interested in pooling.

Consultation Discussing Equitable Services Provided Through Pooling

3. Participating LEAs and Private schools consult on parameters of pooling.

- Participating LEAs and private schools will conduct consultation in accordance with ESSA. GaDOE will provide a consultation guide and checklist that is inclusive of pooling by August 21, 2020.
- LEAs and private schools must identify a Managing LEA who will serve as the fiscal agent. GaDOE recommends the following selection methods in this order:
 - Geographic Boundaries
 - Size of Allocation
 - Longevity of Provision of Equitable Services

Attendance Zone/ Poverty Verification

4. If LEAs and private school agree to pool, original LEA will complete school zone/ poverty verification.

- Original LEAs will work with private schools to verify residency in a Title I school attendance zone and which of those students meet poverty criteria based on Title I, Part A 2019 Non-Regulatory Guidance.
- This poverty count is as of Tuesday, November 3, 2021.

2021-2022 ES4PS Form A

5. Each original LEA and participating private school must complete ES4PS Form A.

- Each original LEA will send 2021-2022 Form A to participating private schools and should note in the comments the intent to pool.
- The poverty count included is as of Tuesday, November 3, 2021.
- Form A should be submitted as soon as all counts for all participating programs are received for the upcoming year, no sooner than the day following the November 3, 2020 poverty count.
 - *Only schools participating in IC, IIIA, and IVB should submit in Spring 2021.

Planning the Title I, Part A Program

6. Managing LEA will consult with private school to create Title I, Part A educational program based on multiple, educationally related, objective criteria.

- Managing LEA will consult with private school to create Title I, Part A educational program based on multiple, educationally related, objective criteria.
- Planning should take into account ALL eligible students in the private school to submit one rank order list.

Administrative Set-aside

7. All LEAs and Private Schools will sign and submit to GaDOE an MOU for Pooling Title I, Part A Equitable Services Across LEAs

- The MOU will be available by August 21, 2020 and is due in Spring 2021.

Calculating Proportionate Share

8. GaDOE will calculate the FY22 proportionate share for equitable services using the verified poverty count.

- GaDOE will calculate the FY22 proportionate share for equitable services using the verified poverty count.
- This will be published on State Ombudsman website, denoting schools participating in pooling across LEAs.

SBOE Approval of Allocations and Pooling

9. GaDOE will submit to the SBOE Title I, Part A allocations which will indicate LEAs/private schools pooling across LEAs.

10. Final approved allocations and additional funds approved for Title I, Part A pooling across LEAs will be loaded in ConApp by GaDOE Grants Accounting.

Providing & Evaluating Equitable Services

11. Managing LEA will provide 2021-2022 equitable services and complete Form B.

- Managing LEA will provide 2021-2022 equitable services.
- Managing LEA will work with private school to complete Form B. GaDOE will provide directions prior to the opening of 2021-2022 Form B.

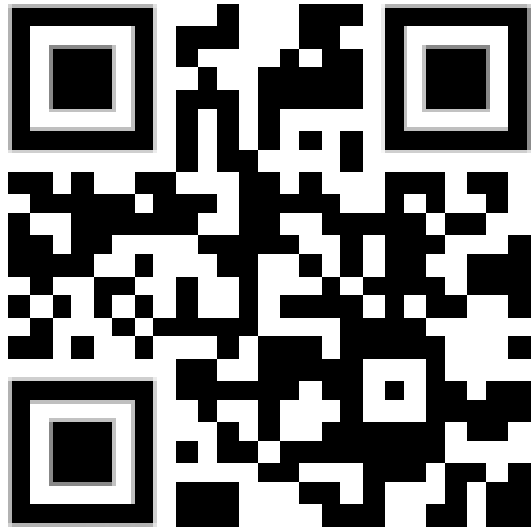
Miscellaneous Pooling Info

- **Budgeting** – Managing LEA will enter and submit budget in ConApp.
- **Indirect Cost** – Managing LEA will apply own indirect cost to all eligible expenditures.
- **Comparability** – Pooling does not impact comparability. Comparability is calculated using only LEA public school data.
- **Drawdowns** – Managing LEA will follow current procedures for drawdown of funds for all public and private schools, including schools participating in pooling across LEAs.
- **Completion Report** – Managing LEA will submit the completion report.
- **Carryover** – How funds are carried over depends on consultation and continuing participation in pooling. GaDOE, LEAs and Private Schools will discuss next steps for carryover following FY22 closeout.
- **State and Federal Reporting** – Currently there is no special reporting specific to equitable services.
- **Maintenance of Effort (MOE)** – A reduction in allocation of an original LEA due to MOE may result in a reduction of funds available for equitable services and pooling.

Title I, Part A Pooling Across LEAs

Feedback - Ombudsman@doe.k12.ga.us

Please provide us with feedback by completing our short survey.
The survey can be accessed by QR code or the abbreviated link below.



OR

<https://bit.ly/2LephaM>

Open your phone's camera and hold up until you can see QR code. Your phone will prompt you to access a website – allow access.

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