



## FY23 Poverty Frequently Asked Questions for Title I, Part A

The following Frequently Asked Questions (FAQ) about options for obtaining poverty counts for Title I, Part A purposes in FY23 are provided as a resource for LEAs. Additional questions will be added over the coming days and weeks. GaDOE appreciates all the individuals who have asked questions and volunteered samples for use around the state.

### **Information we currently know about FY23 Title I, Part A Poverty Information (As of 7/23/2021)**

- School Nutrition Program (SNP) will operate Seamless Summer Option (SSO), which means all students are provided meals at no cost through June 2022 and the SNP will not need to collect Free and Reduced Lunch Applications in the Fall of 2021 to determine eligibility.
- The method to be used to determine FY23 Poverty Data will be the Local Education Agency's (LEA) decision.
- An LEA may choose to process free and reduced applications in the Fall of 2021.
- USED is currently working on a Fact Sheet for FY23 about poverty options. From early discussions, the options will most likely be similar to the FY22 options.
- Districts that operate a Community Eligibility Program (CEP) will have enrollment information and be able to produce poverty data for the districts.
- Districts that operate Provision 2 Programs have calculations and will be able to produce poverty data for the districts.
- An LEA may use a combination of methods to determine the local poverty for Title I, Part A purposes, which may include using direct certification numbers and a local survey. LEAs need to ensure the combination of methods will not duplicate students. GaDOE has created a sample survey which does not have to go through the formal verification process that is required with Free and Reduced Lunch (FRL) applications.

### **Sample Questions and Answers**

**1. Question: *Since we are a smaller district with consistent enrollment, could we send a basic form to all families asking the following questions:***

- ***Has your income changed since September 2020 in such a way that might change your Free/Reduced lunch status? If yes, please explain.***
- ***Has the number of children from your household attending Schools changed since September 2020? If yes, please explain.***

***This information should inform us whether enough change has taken place to impact our numbers significantly. If it is significant, we could have those who indicated "Yes" to those questions complete an application. Could this approach be an acceptable option?***

**Answer:** This is not an option for SNP; however, for Title I purposes only this could possibly be a way to update poverty data. The district would need to create the form for Title I purposes.

**2. Question: *In talking to the Food/Nutrition Director, she suggested that we use direct certification (DC) numbers and the 1.6 multiplying factor for FY23. The DC numbers are usually very consistent from year to year. Would that work?***



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**Answer:** Yes, this is an option even if the schools are not CEP for FY23 Title I purposes. A district may use the direct certification numbers for the poverty number on the Title I Eligible Attendance worksheet and use the 1.6 multiplier to determine for Title I rank order and allocations. Title I has a sample Title I Eligible Attendance Area Spreadsheet on the website that could be used to determine if this is a beneficial option for the LEA.

For CEP schools, the LEA School Nutrition Director will continue providing the poverty counts for the CEP schools using the Title I CEP Data Form.

GaDOE Title I Department will update the embedded Eligible Attendance Area Worksheet within the Consolidated Application so that a district that typically uses the free and reduced application may apply the 1.6 multiplier for FY23.

3. **Question:** *If we use direct certification, how do we complete the eligible attendance area worksheet since we don't have CEP schools?*

**Answer:** GaDOE Title I will update the embedded spreadsheet in FY23 to allow for all districts to utilize the 1.6 multiplier.

4. **Question:** *Since all students are eating free under the SSO in SY2021-2022 and we fully expect fewer forms to be returned, will the District be able to use previous data (2019-2020 or 2020-2021) for SY2022-2023?*

**Answer:** We are waiting on guidance and the USED FY23 Fact Sheet.

5. **Question:** *Can FRL applications be sent electronically?*

**Answer:** Yes, but other distribution methods must also be utilized.

6. **Question:** *If we use the survey option, will those numbers be reported on the FRL report?*

**Answer:** No, the survey information will not be reported on the FRL report. The survey will be for FY23 Title I, Part A purposes only.

7. **Question:** *For FY22, we were given the flexibility to use the prior year's free and reduced-price lunch eligibility. Is there any discussion about giving the same flexibility for FY23 allocations?*

**Answer:** The proposed USED FY23 Fact Sheet will address the flexibility information. This is forthcoming in a few months, but we do anticipate flexibility options similar to FY22.

8. **Question:** *Are we still able to send home FRL Forms?*

**Answer:** Yes, this is an LEA's decision.



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9. **Question:** *How do we calculate proportionate share for private school equitable services since that worksheet asks for the total number of poverty students? Would we take the number of direct certification students, multiplied by 1.6, and use that figure as the total number of students?*

**Answer:** Yes, that is an option. There are five methods for determining poverty for private schools that are available for consultation between the district and the private school. GaDOE Title I Department will complete the Proportionate Share Worksheet for each LEA with private school participation.

10. **Question:** *If we have schools that drop below 35% with any of these options/scenarios, does the 125% apply?*

**Answer:** Yes, the 125% rule is activated if Title I schools being served fall below 35%. You may want to consider applying for an Ed-Flex waiver for an 125% rule exemption in the FY23 Consolidated LEA Improvement Plan (CLIP).

11. **Question:** *Can we wait until October 2022 after the FTE count and new FRL report to complete the rank order and school allocation?*

**Answer:** Yes, but remember that means that Title I, Part A funds will not be available until after the FTE count and FRL report are both completed and verified.

12. **(New 9/1/21) Question:** *Have other schools been asking about how to determine fee waivers for College Board (applications, SAT/ACT, AP exams) if they are not collecting Free and Reduced Applications? A "federal DOE form" has been mentioned. Any idea about what form they are referencing?*

**Answer:** Information on this form may be obtained from the following:  
Martha Smith [masmith@doe.k12.ga.us](mailto:masmith@doe.k12.ga.us)  
Allison Coker [acoker@doe.k12.ga.us](mailto:acoker@doe.k12.ga.us)

13. **(New 9/1/21) Question:** *One of the options for an LEA to gather poverty counts for Title I purposes is to create and send a survey to parents. What are the requirements for the Title I staff in verifying the information on the returned surveys? We know that USDA has requirements in place for collecting and verifying the FRL forms that School Nutrition collects. However, School Nutrition is neither sending nor collecting the surveys, Title I staff are.*

**Answer:** The LEA may collect the exact same information on this survey form that is collected on the NSLP household application while removing references to USDA and the NSLP. In terms of verification, a parent or guardian signature is sufficient. Finally, an LEA must also ensure that it protects the information collected through these forms so that the LEA does not reveal any personally identifiable information about students and families and that access to this



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information is restricted to a limited number of staff that need it for ESEA section 1113 purposes (per USED email to GaDOE Title I).

14. **(New 9/1/21) Question: If the LEA chooses to use surveys as mentioned in question #13, is there a set time span to collect the surveys? For example: the first 30 days of school, by September 30<sup>th</sup>, no set requirement, etc.**

**Answer:** An LEA has flexibility in how it implements its survey, including the timeline of when it collects this information as long as the LEA has the data it needs in time to allocate Title I, Part A funds to schools consistent with ESEA section 1113. Other than that, there is no required deadline (per USED email to GaDOE Title I).

15. **(New 9/1/21) Question: If the 2020 enrollment data is not an accurate picture of the LEA, may the LEA use the best available enrollment data to determine poverty?**

**Answer:** If this situation were to occur, we [USED] agree that the LEA could use what it and the Georgia Department of Education consider to be the best available data, which could be enrollment data from the 2019-2020 school year or projected enrollment data based on school registrations for the 2021-2022 school year. As you [GaDOE Title I] indicated, the LEA would need to use a consistent method of counting enrollment in its schools (per USED email to GaDOE Title I).

### **The following information has been provided by the School Nutrition Program State Director.**

1. **Question: If an LEA participates in SSO and the decision is made to collect FRL applications, can some of the FRL process requirements be waived (10 days to process, new students processed immediately, notifying household if denied, appeal instructions)?**

**Answer:** If meal applications are collected the requirements such as the timeline and requirements such as verification would still apply as part of the Free and Reduced Policy.

2. **Question: If an LEA does not collect FRL applications, how does the SNP help the families who need documentation for internet service and paying for the SAT?**

**Answer:** The district could assist with economic status either with a general economic collection form or a FRL application that is processed according to the FRL policy.

3. **Question: For those LEAs that collected FRL applications in the fall of FY20, can the roll-over status of 30 days be used for poverty numbers for Title I purposes in FY23.**

**Answer:** This would be a question for the US Education guidance.

4. **Question: How does not collecting FRL applications affect e-rate?**

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**Answer:** There may be an opportunity to utilize the Direct Certification data with a multiplier to determine e-rate or there may be an opportunity to use last year's data for this year's report. This request would need to be clarified with the overseeing agencies.

5. **Question:** *If a district puts direct certification numbers on the FRL report 0001, how will this affect the economically disadvantaged (ED) subgroup for accountability/assessment? Are the superintendents aware of this?*

**Answer:** That is definitely a consideration as the SNP program participation with F&R meal applications are not required for eligibility and the responses from parents may not be as good for district data.

6. **Question:** *Does SNP support a district sending out a survey (like the FRL application) to capture families of poverty. If a district sends out a survey, would this waive the FRL application requirements? This is allowable for Title I purposes. Would a survey be valid for accountability, internet services, SAT payments, and e-rate purposes?*

**Answer:** The district support of the economic data collection with a survey would be important. Other states gather economic data with surveys, not sure how that is shared for internet services, SAT payments or e-rate purposes- those administering program agencies would have to share their acceptance.

7. **Question:** *Are there any good ideas, initiatives, or campaigns that others have initiated to encourage more parent participation in completing the free and reduced meal application?*

**Answer:** GaDOE School Nutrition and the local school nutrition programs have utilized social media and promotion to encourage participation, have been sharing information through social media and within their districts about the benefits of completing F & R applications.

8. **Question:** *Does SNP need to complete Part 2 of the CEP worksheet for the FRL districts using direct cert numbers for FY23?*

**Answer:** SNP has the direct certification information that can be used for this purpose only with CEP schools.