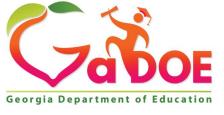
# Determining Poverty for Private Schools

2021



## **Determining Poverty for Private Schools**





## **Equitable Services Update**

### UPDATES: TITLE I, PART A - USDE UPDATE ON DATA COUNTS - MEMO 2020-25

OB32-2020-25 Other than statutory and neglistary negativements included in the document, the contents of this guidance do not have the force and effect of low and are not mused to bind the public. Dist document to translated only so provide clerity to the public negarding existing requirements under the low or agency policies.



UNITED STATES DEPARTMENT OF EXECUTION OFFICE OF ELEMENTATION OF ELEMENTATION OF THE OWNER OWNER

FACT SHEET

STATE ADMINISTRATE PROGRAMS UNDER THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1948 AND THE NATIONWIDE WAIVER FROM THE U.S. DEPARTMENT OF AGRICULTURE TO ALLOW MEAL PATTERN ILEMBELITY IN THE SYMMER FOOD SERVICE PROGRAM AND THE NATIONAL SCHOOL LEVEL PROGRAM STAME IS SYMMER OPTION THEORYGE PUR 2012

Due to the served Commissions disease 2019 (COVED-19), the U.S. Department of Agriculture's (CHEDA's) Food and Strumina Service (FNS) granted automobile valuence (CASA) wastern) through June 38, 2021, to support across to automate meants while manuscraine potential exposure to COVED-19. (See additional submitted on the FNS Response to COVED-19). The USDA wastern rother to the National School Limited Program (SSP), the School Bereighter Program (SSP), the Southers Strumer Option (SSO), and the Strumer Food Service Program (SFSP). Relatedly, the USDA administration the artific absenced component of the Child and Adult Care Food Programs (CACPP).

Although the USDA, use the U.S. Deportment of Education (ED), administers the Federal used programs loted above, there is a connection between verse of these programs and some statealtransies of formula programs under the Elementury and Secondary Education Act of 1965 (ESEA). This connection occurs in two grammy ways, as described in this fact sheet.

With respect to the first connection between an ESEA program and the USDA waivers, there is accordination at the local level between the Title PV. For B – Net M. Larney 21st Century Community Jerning Corners (21st CCLC) program. Some administrated by ED, and USDA's CACFF program. Specifically, CACFF provides afterschool neath to children who participate in the 21st CCLC program. This has raised a question as to whether the at-soil interaction inerals component of the CACFF, which operates during the regular school year, may operate simultaneously with the 37st and the 550 during the auginomentation of the CNDA waivers.

The USDA has street that the CACFP may operate simultaneously with the SFSP and the SSO during implementation of the USDA wavever. See USDA's full imposse to this question, "which is also installed face."

- Applicable to Title I, Part A Equitable Services
- LEAs/NPSs who use the national School Lunch Program (Only used by 6 private schools in GA) may use 2019-2020 counts for 2021-2022 due to lack of accurate data in 2020-2021.
- LEAs/NPS are only required to collect data every 2 years if agreed upon in consultation (2019 IA NRG Q B-12)
- LEAs have 5 methods to choose from when determining eligible student counts (2019 IA NRG Q B-11):
  - 1. Same Measure as LEA NSLP/FRL
  - 2. Comparable Poverty Data from a Survey (Extrapolated)
  - 3. Comparable Poverty Data from Another Source
  - 4. Proportionality
  - 5. An Equated Measure



<sup>\*</sup> According to USDA. "The or cold otherwheel mesh component of the CACEP, which species during the regular school year, any species construenced; with the SPIP-S1O during anglessemmen of Times with As arend in SP

### ESEA, SECTION 1117 ALLOWABLE MEASURES

### **Methodology To Calculate Proportional Share in Line with Section 1117**

While methodologies must be discussed in consultation, the methodology selected is at the LEA's discretion.

LEAs may use one or more method across schools and within schools.

þ	LEAs may use one or more method across schools and within schools.				
	Method #1	Method #2	Method #3	Method #4	Method #5
١	Same Measure Used to Count Public School Students	Comparable Poverty Data From A Survey	Comparable Poverty Data From A Different Source	Proportionality	An Equated Measure
	If the private school utilizes the same method to measure poverty count, such as the free and reduced priced lunch, through consultation it may be determined the data provides an accurate count of private school students.	An LEA may use a survey to obtain poverty data comparable to those used for public school students.  1) Verification of residence in a participating Title I public school attendance area;  2) Grade level and age of each child; and  3) Income level of parents	An LEA may use poverty data for private school children that are from a different source than the data it sues for public school children so long as the income threshold in both sources is generally the same.	Utilize the low-income percentage of each participating Title I public school attendance area to the number of private school students who live in that same school attendance area.	An LEA may use an equated measure of low-income by correlating sources of data – that is, determining the proportional relationship between two sources of data on public school children and applying that ratio to a known source of data on private school children.

### ESEA, SECTION 1117 ALLOWABLE MEASURES

### Method #1

Same Measure Used to Count Public School Students

If the private school utilizes the same method to measure poverty count, such as the free and reduced priced lunch, through consultation it may be determined the data provides an accurate count of private school students.

Data Source: USDA Free/Reduced Lunch Data

FAQ: Does the private school have to have an official USDA lunch program to use this methodology?

Yes, the private school must participate in USDA to use it. (Refer to 2019 Title I, Part A Non-Regulatory Guidance B-11)

- Private school total enrollment: 535
- Private school students residing in Title I attendance area: 150
  - Private school students who qualify for free/reduced lunch: 25
  - Private school students who do not qualify for free/reduced lunch: 125
- Poverty count used for proportionate share calculation worksheet: 25



### ESEA, SECTION 1117 ALLOWABLE MEASURES

### Method #2

## Comparable Poverty Data From A Survey

An LEA may use a survey to obtain poverty data comparable to those used for public school students.

- Verification of residence in a participating Title I public school attendance area;
- 2) Grade level and age of each child; and
  - 3) Income level of parents

**Data Source:** Private School Survey

FAQ: What is the survey required to contain?

Student residency, grade level, age, and income level of parent/guardians, number of household residents

(Refer to 2019 Title I, Part A Non-Regulatory Guidance B-11-2)

- Private school total enrollment: 400
- Private school students residing in Title I attendance area: 200
  - Private school students who return survey: 150
    - Students who qualify based on DHHS income level: 45
    - Students who do not qualify based on DHHS income level: 105
  - Private school students who do not return survey: 50
  - LEAs must extrapolate the data received to the total number of surveys distributed. 45150 = 30% 200\*.30 = 60
- Poverty count used for proportionate share calculation worksheet: 60



## Title I, Part A ESEA, DHHS 2020 POVERTY GUIDELINES



U.S. Department of Health & Human Services: https://aspe.hhs.gov/2020-poverty-guidelines#thresholds

### ESEA, SECTION 1117 ALLOWABLE MEASURES

#### Method #3

## Comparable Poverty Data From A Different Source

An LEA may use poverty data for private school children that are from a different source than the data it sues for public school children so long as the income threshold in both sources is generally the same.

**Data Source:** Tuition Scholarship Application

FAQ: What criteria should officials be able to extrapolate from tuition scholarship applications?

Student residency, grade level, age, and income level of parent/guardians. If exact income is not reported, income levels available on the application should be comparable of DHHS income levels in order to verify eligibility. (Refer to 2019 Title I, Part A Non-Regulatory Guidance B-11-3)

- Private school total enrollment: 335
- Private school students residing in Title I attendance area: 100
  - Private school students who complete application: 75
    - Students who qualify for Title 1 based on DHHS income level: 15
    - Students who do not qualify for Title I based on DHHS income level: 60
  - o Private school students who do not return applications: 25
- Poverty count used for proportionate share calculation worksheet: 15



### ESEA, SECTION 1117 ALLOWABLE MEASURES

#### Method #4

### **Proportionality**

Utilize the low-income percentage of each participating Title I public school attendance area to the number of private school students who live in that same school attendance area.

Data Source: LEA Title I School Level Poverty

FAQ: Can proportionality be applied to total enrollment?

No. LEAs must verify individual student residency in Title I attendance areas, grade level and then apply school level poverty percentages. (Refer to 2019 Title I, Part A Non-Regulatory Guidance B-11-4)

- Private school total enrollment: 421
- Private school students residing in LEA: 200
  - Private school students who reside in Title I attendance area: 175
    - Students who qualify for Title I Primary School A (60% Poverty: 75\* .6=45
    - Students who qualify for Title I Elementary School B (50% Poverty): 25\* .5=12.5
    - Students who qualify for Title I Elementary School C (75% Poverty): 50\* .75=37
    - Students who qualify for Title I Middle School D (65% Poverty): 25\* .65=16
  - Private school students who do not reside in a Title I attendance area: 25
    - Students who attend Primary School E (20% Poverty): 5
    - Students who attend High School F (25% Poverty): 20
- Poverty count used for proportionate share calculation worksheet: 110



## CARES ACT Updates 09.28.20 Data Used to Support Proportionality

What data would a LEA use to determine proportionality?

- November 6, 2018 Residency
- November 6, 2018 Poverty
- 2019-2020 List Title I Attendance Areas and Poverty %

The amount of Title I funds allocated to each participating public school attendance area is determined mainly on the basis of the total number of low-income students residing in each area. Once the participating public school attendance areas have been established, an LEA calculates the per-pupil allocation (PPA) for each participating public school attendance area. Then, based on the total number of children from low-income families residing in each attendance area attending either public or private schools, the LEA calculates the total amount of funds for each area. From this amount, the LEA designates an amount of funds (equal to the PPA multiplied by the number of low-income private school students in the area) to provide equitable services to eligible private school participants.

2006 Title I Toolkit



### ESEA, SECTION 1117 ALLOWABLE MEASURES

### Method #5

## An Equated Measure

An LEA may use an equated measure of low-income by correlating sources of data – that is, determining the proportional relationship between two sources of data on public school children and applying that ratio to a known source of data on private school children.

Data Source: SNAP/TANF, Other Equated Measure of Low Income

### FAQ: Are all students who qualify for SNAP/TANF eligible to be served?

No. this measure uses a ratio to determine the proportional relationship between two sources of data.

(Refer to 2019 Title I, Part A Non-Regulatory Guidance B-11-5)

- Private school total enrollment: 657
- Private school students residing in Title I attendance areas: 264
  - Private school students who qualify for SNAP/TANF: 5
  - Private school students who do no qualify for SNAP/TANF: 259
  - Private school students who qualify for FRPL: unknown
  - Public school students who qualify for SNAP/TANF: 500
  - o Public school students who qualify for FRPL: 5000
  - Private School
     SNAP/TANF
     X
     Public School
     SNAP/TANF
     TANF
     TANF
- Poverty count used for proportionate share calculation worksheet: 50



## ESEA, 2019 TITLE I, PART A EQUITABLE SERVICES NON-REGULATORY GUIDANCE

- May an LEA use more than one method of collecting poverty data on private school children? (excerpted from question B-16)
  - Yes, It may be necessary for an LEA, after consultation with private school officials, to use more than one method of collecting data on children living in poverty among private schools or within a single school. However, the LEA must ensure that there are no duplicate counts and that the methods used have comparable income levels.
- How do LEA officials determine the accuracy of information provided by the private school officials? (excerpted from question B-14)
  - Private school officials may provide LEAs copies of poverty data. If LEAs are not provided a copy for their records, LEA officials may review the data at the private school. Private school officials must maintain relevant data not provided to the LEA in their files.
- Is an LEA's collection of poverty data on private school students affected by CEP data? (excerpted from question B-21)
  - Maybe. If an LEA allocates Title I funds to its public schools based on their direct certification counts multiplied by 1.6, the LEA may use a poverty measure with a poverty threshold for private school students equal to the CEP threshold it is using for public school students and multiplied by 1.6.

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