

Determining Poverty for Private Schools

2021

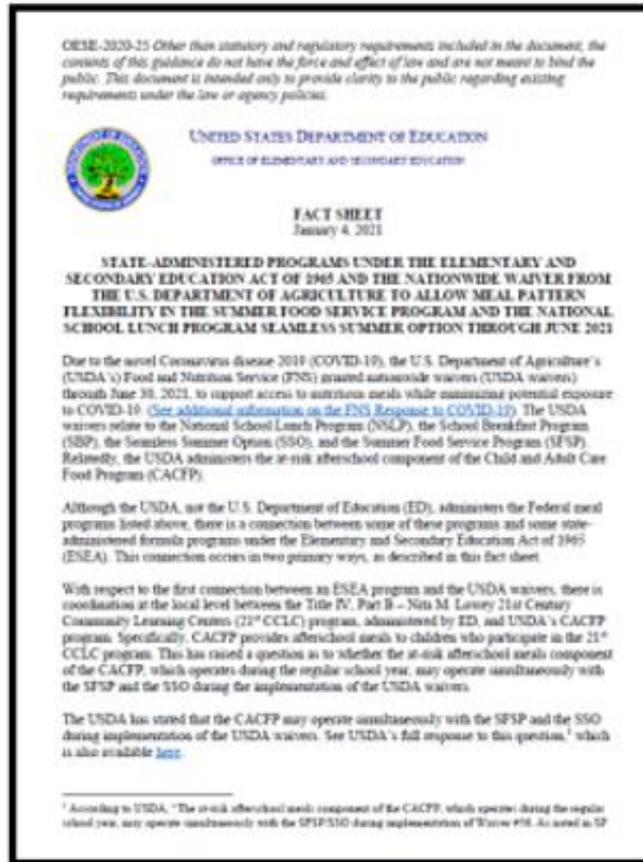


Determining Poverty for Private Schools



Equitable Services Update

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



- 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

Title I, Part A

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.

Method #1	Method #2	Method #3	Method #4	Method #5
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 uses 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.

Title I, Part A

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)

Example:

- 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**

Title I, Part A

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.

- 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

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)

Example:

- 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.
 $45/150 = 30\%$ $200 * .30 = 60$
- **Poverty count used for proportionate share calculation worksheet: 60**

Title I, Part A

ESEA, DHHS 2020 POVERTY GUIDELINES

2020 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA

Search in table for...

PERSONS IN FAMILY/HOUSEHOLD	POVERTY GUIDELINE
1	\$12,760
2	\$17,240
3	\$21,720
4	\$26,200
5	\$30,680
6	\$35,160
7	\$39,640
8	\$44,120

For families/households with more than 8 persons, add \$4,480 for each additional person.

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

Title I, Part A

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 uses 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 to DHHS income levels in order to verify eligibility. (Refer to 2019 Title I, Part A Non-Regulatory Guidance B-11-3)

Example:

- 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 I based on DHHS income level: 15
 - Students who do not qualify for Title I based on DHHS income level: 60
 - Private school students who do not return applications: 25
- **Poverty count used for proportionate share calculation worksheet: 15**

Title I, Part A

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)

Example:

- 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.

Title I, Part A

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)

Example:

- 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 not qualify for SNAP/TANF: 259
 - Private school students who qualify for FRPL: unknown
 - Public school students who qualify for SNAP/TANF: 500
 - Public school students who qualify for FRPL: 5000
 - Private School Public School

$$\frac{\text{SNAP/TANF}}{X} = \frac{\text{SNAP/TANF}}{\text{FRPL}} \quad \frac{5}{X} = \frac{500}{5000} \quad X = 50$$

- **Poverty count used for proportionate share calculation worksheet: 50**

Title I, Part A

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.

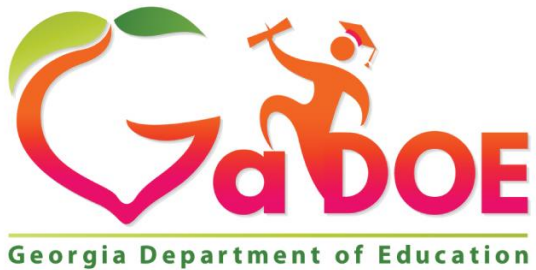
- **Is an LEA's collection of poverty data on private school students affected by CEP data? (excerpted from question B-21)**

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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