

# Equitable Services to Non-public Schools

## Calculating the Proportionate Share under Title I, Part A



### Method of Determining Low-Income Count

Section 1117(c)(1) of the Every Student Succeeds Act provides local education agencies (LEAs) with four methods to select from to determine the number of children who are from low-income families and attend private school for the purpose of calculating the proportionate share under Title I, Part A. When deciding the standard to apply when determining the low-income status of a student attending private school, the local educational agency has the final authority to determine which of the following methods is comparable and appropriate:

- (1) the same measure of low income used to count public school children (i.e. free or free and reduced);
- (2) the results of a survey that, to the extent possible, protects the identity of families of private school students, and allowing such survey results to be extrapolated if complete actual data are unavailable;
- (3) the low-income percentage of each participating public school attendance area to the number of private school children who reside in that school attendance area; or
- (4) an equated measure of low income correlated with the measure of low income used to count public school children.

If the method selected by the LEA requires an exchange of data between the non-public school and the LEA, the guidance below should be followed.

### How to Calculate the Proportionate Share

#### **STEP 1**

Identify the number of low-income students residing <sup>1</sup> within the eligible Title I school's boundary that attend public school. Enter this in the Consolidated Application platform.

#### **STEP 2**

Identify, through consultation with the non-public school, the number of low-income students residing within the Title I school's boundary <sup>2</sup> that attend private school. Enter this in the Consolidated Application platform.

*Considerations: To determine the proportionate share, the non-public school must provide student address information; however, the LEA does not need to obtain the name of the student or family in order to verify that the student address is within the Title I school boundary. Further, statute provides the LEA with four methods (listed above) of determining whether the student would qualify as low-income for purposes of determining Title I poverty measures. The LEA should choose the most comparable method and discuss this with the non-public school during consultation; however, the LEA ultimately makes the final determination regarding what measure is comparable.*

<sup>1</sup> The number of students residing in the Title I School boundary is not necessarily the same number of students enrolled or attending the Title I School. While October count numbers may be helpful in determining the number of students residing in the boundary, it likely does not accurately capture the entire count. See the table on page 2 for additional information.

<sup>2</sup> When determining the number of students residing within the Title I school boundary, the LEA should only consider students in comparable grade levels as those being served by the Title I school. For instance, if the Title I school serves k-5 students, only non-public school students in grades k-5 should be considered when determining step 2.

#### Frequently Asked Questions

**Question:** May an LEA reserve funds off the top of its Title I allocation before it allocates funds for equitable services?

**Answer:** No. An LEA must determine the amount of funds available for providing equitable services prior to any expenditures or transfers of funds. This includes all reservations previously taken "off the top" of an LEA's Title I, Part A allocation, including reservations for administration, parental involvement, and district-wide initiatives.

*Note: This is a change from how the funds were previously calculated to provide equitable services under the No Child Left Behind (NCLB) Act. LEAs will no longer use the school-level per-pupil amount (PPA) to determine the amount of funds to reserve to provide equitable services under Title I.*

**Question:** If we are compensating another district for providing services to a student that resides in our boundary but attends private school in another district, do you include those students in the proportionate share?

**Answer:** Yes, the sending district should include students attending a private school outside the district boundary, but residing in the district boundary, in the proportionate share calculation when possible. Districts should develop an inter-district MOU to address how the two districts will work together to provide equitable services to students in private schools. CDE is currently developing guidance regarding the MOU process and format.

**Question:** Are the students that generate the proportionate share the only students that may access the equitable services provided in the non-public school?

**Answer:** No. Student eligibility for Title I, Part A services for private school children is determined by (1) residence in a participating public school attendance area, and (2) educational need. Poverty is not a criterion.

**STEP 3**

Add together the aggregate sum from steps #1 and #2.

**STEP 4**

Divide the aggregate from step #2 by the sum of step #3. The quotient is the percentage which represents the proportionate share.

**STEP 5**

Multiply step #4 by the LEA's total Title I allocation. The product equals the amount of funds that must be set-aside to provide equitable services with Title I, Part A funds to participating non-public schools.

**STEP 6**

Budget family engagement activities to the non-public school and the administration reservation (as determined through consultation) from the proportionate share. In other words, these budget items should be accounted for with funds already set-aside for the proportionate share, not in addition to the proportionate share.

## Example of Determining the Amount of the Proportionate Share under Title I, Part A

<u>Public Schools Being Served by the LEA with Title I Funds</u>	Number of Low-Income Students who are: <ul style="list-style-type: none"><li>• Residing within the Title I School Boundary, and</li><li>• Attending Public School</li></ul>	Number of Low-Income Students who are: <ul style="list-style-type: none"><li>• Residing within the Title I School Boundary, and</li><li>• Attending a Non-Public School</li></ul>	Total
Title I School A	300	20	320
Title I School B	150	5	155
Title I School C	500	25	525
Total	<b>950</b>	<b>50</b>	<b>= 950+ 50 = <u>1000</u></b>
Percentage of Students	= 950/(950+50) = 95%	= 50/(950+50) = 5%	
Proportionate Share of \$1M Title I Allocation	= .95 * \$1M = \$950,000	= .05 * \$1M = \$50,000	

Must reflect the students that reside in the Title I school's boundaries. LEAs may use Geographic Information System (GIS) mapping information (typically accessed for transportation purposes), the Title I School's residing and attending home enrollment, or other information available to the LEA to determine this number. The number of students residing in the Title I school boundary is likely not the same as the number of students attending the Title I school. (See Step 1 on page 1)

Must be obtained through consultation with participating non-public schools (See Step 2 on page 1)

The amount of funds that must be reserved to provide equitable services to participating non-public schools. This must be determined **prior** to taking any set-asides off the top of the LEA's Title I allocation. This amount is inclusive of the funds used to provide parents and family engagement activities to non-public schools, as well as the administration reservation. (See Steps 5 and 6 on page 1)

## Where can I learn more?

- For more information related to the provision of equitable services to non-public schools, visit:  
<http://www.cde.state.co.us/fedprograms/equitableservicescolorado>