# Collecting Poverty Data and Generating Funds for Services to Eligible Private (Non-Public) School Children

**Methods for Collecting Poverty Data**

Under section 1117 of Title I, a district must allocate funds to a participating public school attendance area or school on the basis of the total number of children from low-income families, including low-income children attending private schools. Thus, the district, in consultation with the private school officials, must obtain the best available poverty data on private school children who reside in participating attendance areas. Because private school officials may have access to some sources of poverty information not easily accessible to public school officials, it is very important that public and private school officials cooperate in this effort.

Because generation of funds and eligibility of private school children for services are dependent upon residence in a participating public school attendance area, a district must share the results of its selection process with private school officials early in the consultation process. Other information that generally should be provided in the consultation process includes the following data on each participating area: grade span; enrollment; the number of low-income public and private school children residing in the area; and, as soon as available, the per-pupil allocation of each public school participating area (under ESSA this will be calculated instead upon a district’s total Title I allocation before any reservations are taken).

A district may use the following methods to obtain poverty data on private school children:

1. Using the same measure of poverty. *If available, a district should use the same measure of poverty used to count public school children,* e.g., free and reduced price lunch data.
2. Using comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable.

* 1. *In order to obtain the number of private school children from low-income families, a district may use a survey (see page 5 example) to obtain poverty data comparable to those used for public school students. To the extent possible, the survey must protect the identity of families of private school students.* The only information necessary for a district to collect in such a survey of private school children is:
		+ 1. geographic information verifying residence in a participating public school attendance area;
			2. grade level of each child; and
			3. income level of parents.
	2. *After obtaining income data from a representative sample of families with children in private schools, a district may extrapolate those data to the entire private school student population if complete actual data are unavailable. The district should take care to ensure that the data are truly representative of the private school students in the district.*

**EXAMPLES OF REPRESENTATIVE SAMPLE AND EXTRAPOLATION**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  Column 1 | Column 2 |  Column 3 |  Column 4 |  Column 5 |
| Public school attendance area   | # of resident private school children  | # of private school children submitting surveys  | # of low-income private school children from survey  | extrapolated # of low-income private school children  |
|  A | 150 | 115 | 100 | 130 |
|  B |  20 |  10 |  4 |  8 |

Key:

Column 1. public school attendance area

Column 2. number (#) of resident private school children

Column 3. number of private school children submitting surveys

Column 4. number of low-income private school children on returned surveys

Column 5. extrapolated number of low-income private school children.

CALCULATIONS:

Col. 5 (extrapolated number of low-income children) =

Col. 4 (# of low-income on survey) multiplied by Col. 2 (# resident private school children)

Col. 3 (total submitted surveys)

Or 100 X 150 = 130 4 X 20 = 8

 115 10

1. Using comparable poverty data from a different source. *If data from the same source used for public school children are not available, a district 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.*

For example, a district uses free and reduced price lunch data but private school children do not participate in the free lunch program; however, private school officials are able to provide a district with a count of children who are from low-income families using other sources of poverty data such as Temporary Assistance to Needy Families (TANF) or tuition scholarship programs. If the different sources use different definitions of low-income, a district would need to adjust the results accordingly.

1. Using proportionality. A district may apply 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. To do this, a district will need the addresses and grade levels of those students attending private schools.

**EXAMPLE OF PROPORTIONALITY CALCULATIONS**

A district calculates the percent of poverty of a public school attendance area to be 60 percent. The district then applies the poverty percentage of the public school attendance area to the number of private school children residing in that public school attendance area. For example, if the number of private school children residing in the public school attendance area is 50, then 60 percent of 50 children or 30 children are considered to be from low-income families. The district calculates the per-pupil amount on this number (30 children).

1. Using an equated measure. *A district 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.* For example, a district uses free and reduced-price lunch data, but those data are not available for private school students. However, if TANF data are available, the district could determine an equated measure of poor students in private schools based on free and reduced-price lunch data by correlating the two sets of data as follows: TANF in the public school is to free and reduced price-lunch as TANF in private schools is to “X.”

TANF (public) = TANF (private)

Free & reduced price lunch (public) X (private)

In this example, the district may then use the equated number of private school students based on free and reduced-price lunch data (“X”) as the number of poor private school students.

## Generating Funds for Services to Eligible Private (Non-Public) School Children

After establishing the participating public school attendance areas and determining the number of children from low-income families residing in each participating public school attendance area as described above, the district then determines the overall proportion of children from low-income families who reside in participating public school attendance areas and who attend public schools and private schools. Using the proportion of children from low-income families who attend private schools, the district would determine the amount of funds available for equitable services based on that proportionate share of the district’s total Title I allocation. For example, a district with four Title I public school attendance areas and a total Title I allocation of $1,000,000 would determine the total amount available for all equitable services activities (proportionate share) as follows:

|  |
| --- |
| **EXAMPLE OF DETERMING THE AMOUNT OF TITLE I FUNDS FOR EQUITABLE SERVICES** |
| **Public School Attendance Area**  | **Number of Public School Low-Income Children**  | **Number of Private School Low-Income Children**  | **Total Number of Low-Income Children**  |
| A  | 500 | 120 | 620 |
| B  | 300 | 9 | 309 |
| C  | 200 | 6 | 206 |
| D  | 350 | 15 | 365 |
| **TOTAL**  | **1,350** | **150** | **1,500** |
| **Proportionate** **Share** | **90%** | **10%** |  |
| **$900,000** | **$100,000** |

## Notes Regarding Reservations as they Relate to Generating Funds for Equitable Services

A district 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 a district’s Title I allocation, including reservations for administration, parental involvement, and district-wide initiatives.

If a district has a Title I allocation of $500,000 it must still reserve and spend at least 1% of its allocation to carry out required Title I parent and family engagement activities. In this case the district would have to apply the proportionate share percentage for services to private school students shown in the example above to determine how much it must spend for parent and family engagement activities for the families and parents of eligible private school students. The district must then spend that amount from the proportion of its Title I allocation available for equitable services for private school students. In other words, the district does not reserve a portion of its 1 percent reservation for parent and family engagement activities for participating private school students; rather, this amount comes from the proportionate share that the district already determined.

|  |
| --- |
| **EXAMPLE OF EQUITABLE SERVICES FOR PARENTS AND FAMILIES OF ELIGIBLE PRIVATE SCHOOL CHILDREN** |
| **DISTRICT’s Title I allocation** | **1% for parent and family engagement** | **Proportionate share for equitable services for parents and families (based on example above)** | **Source of funds for equitable services for parents and families (proportionate share under example above = $100,000)** |
| $1,000,000 | $10,000 | $10,000 x 10% = $1,000 | $100,000 −$1,000 = $99,000 remaining for instruction and professional development |

**SURVEY EXAMPLE**

The purpose of this survey is to collect data that will be used to determine the amount of funds available for the public school district to provide Title I services to eligible students in our school. Determining the number of our students, by public school district of residence, who would qualify for free and reduced-price lunches, accomplishes this. The information requested below is confidential. It is not necessary to provide family names.

**A.** Find your family size and look at the annual gross income level listed beside it on the chart below. This chart is based on 2016-2017 USDA Child Nutrition Programs Income Eligibility Guidance.

|  |  |
| --- | --- |
| Family Size | Annual Gross Income for 2016-2017 |
| One | $21,978 |
| Two | $29,637 |
| Three | $37,296 |
| Four | $44,955 |
| Five | $52,614 |
| Six | $60,273 |
| Seven | $67,951 |
| Eight | $75,647 |

* For each additional family member over eight, add $7,601 to your Annual Gross Income.
* If you are paid on a weekly or monthly basis, please multiply that amount by the number of weeks or months actually worked each year to determine you’re “Annual Gross Income.”

|  |  |  |
| --- | --- | --- |
| **B**. | Is your family income less than the amount on the chart on the line beside your family size? Yes \_\_\_\_\_ No\_\_\_\_ |  |
| **C**.  | Is your family eligible for SNAP (EBT Electronic Benefits Transfer)? Yes \_\_\_\_No \_\_\_\_\_ |  |
| **D**.  | Are you receiving Temporary Assistance to Needy Families (TANF)? Yes\_\_\_\_ No \_\_\_\_ |  |
| **E**. | Please provide the following information: |  |

Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Public school district in which you reside:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Note about Using a Survey**

Surveys yielding good data have some common characteristics. The survey itself should be simple and understood by parents, including parents with limited knowledge of English. Letters of explanation are sent to principals, and meetings are held with them to explain the necessity and importance of the survey. Principals are encouraged to meet with the parents and then distribute the surveys. After a period of time has lapsed, during which the surveys should have been received, the principals begin to follow up with those parents who have not returned the surveys. Parents are assured to the extent possible that the completed individual survey forms will be kept in confidence at the private school.

One school district finds that sensitive data, such as income level, are most easily collected when the families providing the data feel that their privacy is being protected. For this reason they use only a numbering system to identify the families and do not require any names on the form. Each principal is given a copy of the form and instructed to number the forms and keep a log. Parents are informed that their names will only be matched to the numbers if they do not return the form (i.e., in order to contact them). Printed at the bottom of the form is "This form has been numbered to protect your privacy. Once we receive the information requested, any linking of this number to your family's name will be kept in strict confidence."

Grade levels of your children:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_