

# Community Eligibility Provision (CEP), Title I, and Accountability

2015 GCEL Annual Conference  
March 2 - 4, 2015

# Presenters



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

Jennifer Davenport, Ed.D.  
Title I, Part A Program Manager  
School Improvement – Federal Programs  
Georgia Department of Education  
[jedavenp@doe.k12.ga.us](mailto:jedavenp@doe.k12.ga.us)  
(404) 463-1955

Margo DeLaune  
Title Programs Director  
School Improvement – Federal Programs  
Georgia Department of Education  
[mdelaune@doe.k12.ga.us](mailto:mdelaune@doe.k12.ga.us)  
(404) 657-1796

## SCHOOL IMPROVEMENT & DISTRICT EFFECTIVENESS





Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Healthy, Hunger-Free Kids Act of 2010 (Act)

With the passage of the Healthy, Hunger-Free Kids Act of 2010 (Act), the National School Lunch Program now includes a new universal meal program, the Community Eligibility Option, which is being phased in over several years by the U.S. Department of Agriculture (USDA). The Community Eligibility Option permits eligible schools to provide meal service to all students at no charge, regardless of economic status.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Implementation of the Community Eligibility Option

- Implementation began in the 2011–2012 school year in local educational agencies (LEAs) in Illinois, Kentucky, and Michigan.
- In the 2012–2013 school year, the USDA selected the District of Columbia, New York, Ohio, and West Virginia.
- In the 2013–2014 school year Georgia was one of four states selected.
- The option became available to all LEAs in the 2014–2015 school year.

# Community Eligibility Option



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- Uses only direct certification data, such as data from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program to determine the Federal cash reimbursement provided by USDA.
- Does not rely on annual household applications that are generally used to determine eligibility for free or reduced meals (FRM).

Georgia Department of Education

# Community Eligibility Option



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[gaode.org](http://gaode.org)

- A school is eligible for the Community Eligibility Option if at least 40 percent of its students are certified for free meals through means other than FRM applications (for example, students directly certified through SNAP).

**Note:** The 40 percent threshold may be determined school-by-school, by a group of schools with the LEA, or in the aggregate for the entire LEA. A percentage of 39.98 percent does **NOT** meet the threshold.

Georgia Department of Education

# Community Eligibility Option



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- To account for low-income families not reflected in the direct certification data, USDA will set meal reimbursement levels for Community Eligibility Option schools by multiplying the percentage of students identified through the direct certification data by a multiplier established in the Act (initially, the multiplier is 1.6).

**Note:** The law states that the multiplier is 1.6 through school year 2013-2014 (July 1, 2013, through June 30, 2014). After that time, Food and Nutrition Services (FNS) is permitted to change the multiplier to a number between 1.3 and 1.6 for any given fiscal year within the original four year timeframe. Otherwise, schools electing CEO will keep the same multiplier for an entire four-year cycle and do not have to implement changes to the multiplier until the next cycle if the CEO is elected again.





Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga.gov](http://ga.gov)  
[gaedoe.org](http://gaedoe.org)

# Community Eligibility Option—Requirement

- Schools must conduct direct certification once every four years. Schools may, however, conduct direct certification on a yearly basis. For the purposes of Title I, Part A, if the most current data show an increase in the percentage of enrolled students who are directly certified, the school may use that percentage for determining USDA reimbursement; if the data show a decrease, the school may continue to use the original percentage.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Impact on Title I, Part A

- LEAs must rank its schools based on the percentage of economically disadvantaged students in each school to determine a school's eligibility to receive Title I funds and to allocate funds to selected schools. (Section 1113 of the ESEA)
- States and LEAs that receive funding under Title I must assess and report annually on the extent to which students are making progress toward meeting state academic achievement standards in reading or language arts and in mathematics. (Section 1113 of the ESEA)

# Impact on Title I, Part A

## Section 1113 of the ESEA

- States and LEAs must measure and report publicly on the progress of all students and of students in various subgroups, including students who are economically disadvantaged. (Section 1113 of the ESEA)
- LEAs must hold schools accountable for the achievement of subgroups. (Section 1116 of the ESEA or under ESEA flexibility for those states with an approved ESEA flexibility request)



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Impact on Title I, Part A

- To meet the requirements of ESEA, an LEA must have school-level data on individual economically disadvantaged students. In Georgia, information from the National School Lunch Program has been the source of data used to identify those students.

Georgia Department of Education

# Guidance

## Issues under the Community Eligibility Option (CEO):

- CEO schools provide lunch at no charge to all students.
- CEO schools may use the same direct certification percentage for up to four years, decided by the LEA.
- CEO schools determine their poverty percentage based on data from students certified through means other than FRM applications (i.e., direct certification data).



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Guidance

## Issues under the Community Eligibility Option (CEO):

- If a school within a district using the CEO Option does not qualify for the CEO option, those schools will continue to use the FRM applications for free or reduced meals. In this case, a school will still continue to use the FRM application counts to determine a schools Title I allocation.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Guidance

## Issues under the Community Eligibility Option (CEO):

- For the purposes of Food and Nutrition Services (FNS), the identified student percentage must be established using the identified students and students enrolled with access to the program no later than April 1st of the prior year.
- For the purposes of Title I, Part A ), the identified student percentage must be established using the identified students and students enrolled with access to the program no later than October FTE count date of the prior year.



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Guidance

For purposes of disaggregating assessment data by the economically disadvantaged subgroup for reporting and accountability, school officials would deem all students in a Community Eligibility Option school as economically disadvantaged. Accordingly, the economically disadvantaged subgroup in a Community Eligibility Option school would be the same as the all students group. Similarly, all students in a Community Eligibility Option school would be eligible for any services for which eligibility is based on poverty.



# Annual Determination of the Eligibility of a CEO School for Title I Funds



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- An LEA must assume that the percentage of economically disadvantaged students in the school is proportionate to the percentage of meals for which that CEO school is reimbursed by the USDA for the same school year.
- Because CEO schools may conduct direct certification yearly, if data show an increase in the percentage of enrolled students eligible for direct certification, and the school therefore receives a higher level of reimbursement from USDA, then the figures used for Title I purposes would be adjusted accordingly.

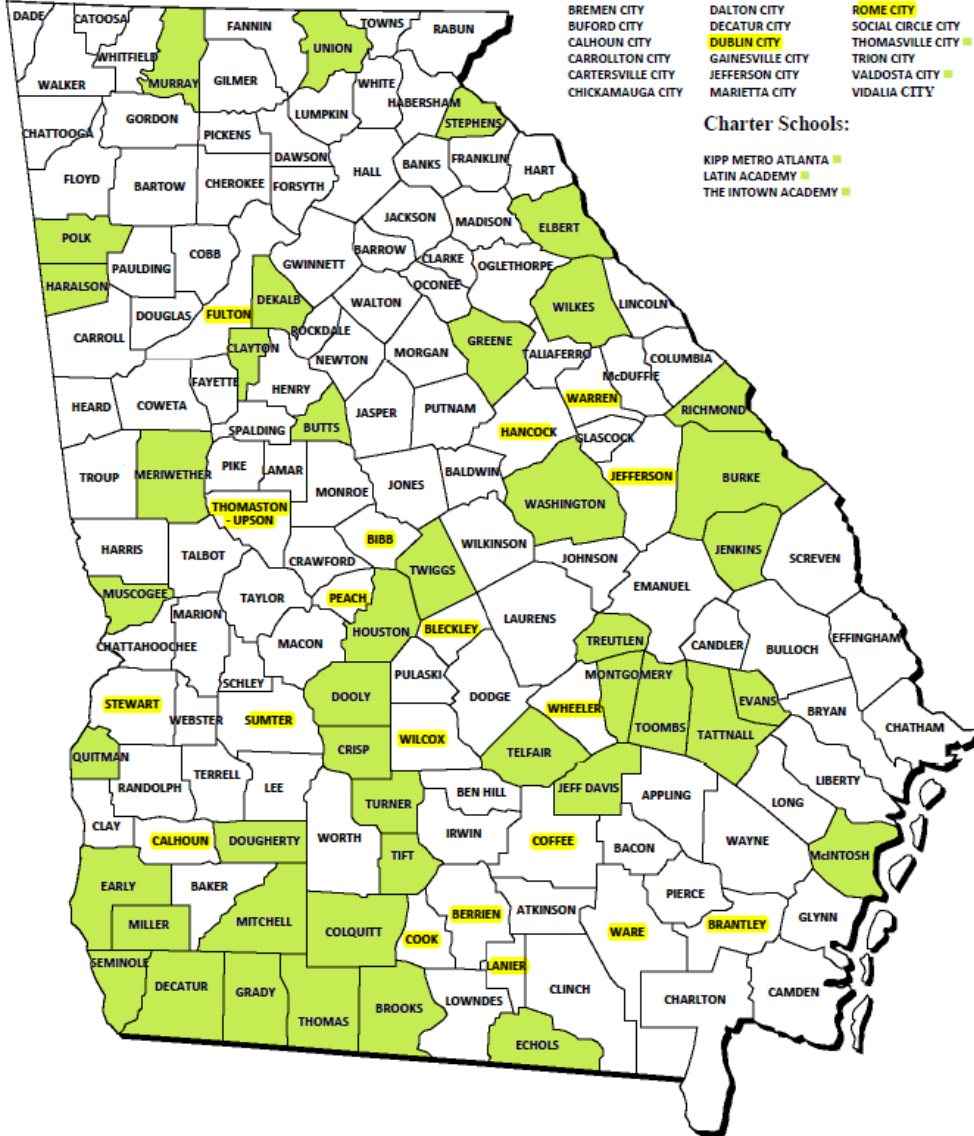
# From School Food Nutrition

Georgia Department of Education

**Georgia School District Map**  
**School Nutrition - Community Eligibility Provision**  
 SY: 2014-2015



Richard Woods,  
 Georgia's School Superintendent  
 "Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)



**City Schools:**

- |                     |                    |                      |
|---------------------|--------------------|----------------------|
| ATLANTA CITY ■      | COMMERCE CITY ■    | PELHAM CITY ■        |
| BREMEN CITY ■       | DALTON CITY ■      | ROME CITY ■          |
| BUFORD CITY ■       | DECATUR CITY ■     | SOCIAL CIRCLE CITY ■ |
| CALHOUN CITY ■      | DUBLIN CITY ■      | THOMASVILLE CITY ■   |
| CARROLLTON CITY ■   | GAINESVILLE CITY ■ | TRION CITY ■         |
| CARTERSVILLE CITY ■ | JEFFERSON CITY ■   | VALDOSTA CITY ■      |
| CHICKAMAUGA CITY ■  | MARIETTA CITY ■    | VIDALIA CITY ■       |

**Charter Schools:**

- |                      |
|----------------------|
| KIPP METRO ATLANTA ■ |
| LATIN ACADEMY ■      |
| THE INTOWN ACADEMY ■ |

2013-14 – 51 systems  
 2014-15 – 72 systems

354,038 students  
 receiving benefits due  
 to CEP

nt of Education



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

# Eligibility Criteria

Who are the identified students?

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families (TANF)
- Extended Eligibles (students "attached" to Direct Certified)
- Matched to Official Lists
  - Homeless
  - Runaways
  - Migrant
  - Income Eligible Headstart
  - Foster children without an Application
  - Pre-K Evenstart



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[gaode.org](http://gaode.org)

# Eligibility Criteria

## Enrolled Students:

- Enrolled in a CEP participating school
- Attending a CEP school
- Has access to lunch or breakfast

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga.gov](http://ga.gov)  
[gaedoe.org](http://gaedoe.org)

# Eligibility Criteria

## School Defined:

- Educational Unit – Public or nonprofit private
- Single building or cluster of buildings
- Private classes or preprimary grade conducted in aforementioned school

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Important

The CEP designation is attached to the school, not the individual students in the school.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

# CEP and Title I

## Determine data needed

- Develop procedure and method of gathering information

## Prepare training for Title I and School Nutrition

- Communicate, communicate, communicate

## Follow Up



# CEP- Identified Student Percentage (ISP) Determination Worksheets



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

## CEP - IDENTIFIED STUDENT PERCENTAGE (ISP) DETERMINATION WORKSHEET

System Name: \_\_\_\_\_ CEP Implementation Year of 4 Year Cycle: \_\_\_\_\_

### PART 1 - CEP PARTICIPATION DISTRICT WIDE CEP PARTICIPATION - (ALL SCHOOLS)

The District-wide sheet should be used only for the SFAs choosing to do CEP for all of the schools in the district. SFA selecting District-wide CEP will use one set of claiming percentages for all of their sites. SFAs should use the individual schools sheet or the group sheet if not all schools in the SFA are participating in CEP.

School Name	School Number	Enrollment as of April 1 (Include all students that can participate in CEP) (local and/or local)	Direct Certified (DC) Students	Extended DC Students	Homeless and Runaway Students	Migrant Students	Frailer Students without Application	Head Start and Pre-K from State Students	Students Approved by Local Officials	GaDOE Only Total	GaDOE Only % ISP	GaDOE Only - Claiming Percentage for Free	GaDOE Only - Claiming Percentage for Paid	Enrollment as of Oct. FTE	CEP - Ind. ISP	Current Yr. DC Info for Title I	Pre-K Enrollment	CEP - Ind. ISP	Current Yr. Pre-K - DC Info for Title I
County High School	1	783	355	28		19				402	51.341%	100.000%	0.000%	792	51.341%	407		51.341%	0
County Middle School	2	722	428	26		16				470	65.097%	100.000%	0.000%	745	65.097%	485		65.097%	0
Elementary School	3	496	280	11		9		45		345	69.556%	100.000%	0.000%	511	69.556%	355	79	69.556%	55
Elementary School	4	453	309	19		10				338	74.614%	100.000%	0.000%	463	74.614%	345		74.614%	0
Primary School	5	634	467	21		12		71		571	90.063%	100.000%	0.000%	655	90.063%	590	89	90.063%	80
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!

### PART 2 DIRECT CERTIFICATION PROPORTIONALITY Calculation for Title I

Part 2 will be used locally to determine the data needed to complete the "Title I Data/CEP SY15-16" initially if actual October DC data is not available. It will also be used to provide DC data to Title I annually for all CEP participating schools.



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

# Part 2 – Direct Certification Proportionality Calculation Title I

## CEP - IDENTIFIED STUDENT PERCENTAGE (ISP) DETERMINATION WORKSHEET

System Name: _____ CEP Implementation Year of 4 Year Cycle: _____										PART 2 DIRECT CERTIFICATION PROPORTIONALITY Calculation for Title I									
PART 1 - CEP PARTICIPATION DISTRICT WIDE CEP PARTICIPATION - (ALL SCHOOLS)																			
The District-wide sheet should be used only for the SFA choosing to do CEP for all of the schools in the district. SFA selecting District-wide CEP will use one set of claiming percentages for all of their sites. SFA should use the individual school sheet or the group sheet if not all schools in the SFA are participating in CEP.										Part 2 will be used locally to determine the data needed to complete the "Title I Data/CEP 9/15-16" initially if actual October DC data is not available. It will also be used to provide DC data to Title I annually for all CEP participating schools.									
School Name	School Number	Enrollment as of April 1 (Include all students that are participating in CEP at this site level)	Direct Certified (DC) Students	Extended DC Students	Homeless and Runaway Students	Migrant Students	Former Students without Application	Head Start and Pre-K Pre-Test Students	Students approved by Local Officials	GAOER Only Total	GAOER Only % ISP	GAOER Only - Claiming Percentage for Free	GAOER Only - Claiming Percentage for Paid	Enrollment as of Oct. FTE	CEP - Ind. ISP	Current Yr. DC Info for Title I	Pre-K Enrollment	CEP - Ind. ISP	Current Yr. Pre-K - DC Info for Title I
_____ County High School	1	783	355	28		19				402	51.341%	100.000%	0.000%	792	51.341%	407		51.341%	0
_____ County Middle School	2	722	428	26		16				470	65.097%	100.000%	0.000%	745	65.097%	485		65.097%	0
_____ Elementary School	3	496	280	11		9		45		345	69.556%	100.000%	0.000%	511	69.556%	355	79	69.556%	55
_____ Elementary School	4	453	309	19		10				338	74.614%	100.000%	0.000%	463	74.614%	345		74.614%	0
_____ Primary School	5	634	467	21		12		71		571	90.063%	100.000%	0.000%	655	90.063%	590	89	90.063%	80
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
										0	#DIV/0!	100.000%	0.000%		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!





Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Allocations

An LEA has options in how it derives this metric. One approach is for the LEA to multiply the number of students identified by direct certification in a school by the 1.6 multiplier and divide by the enrollment in the school.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Allocations

A second approach is for the LEA to rank all of its schools solely on the basis of the percentage of students directly certified through SNAP (or another direct certification measure available annually) in both Community Eligibility and non-Community Eligibility schools. (Because all schools, not just Community Eligibility schools, must directly certify students through SNAP, an LEA should have direct certification data for each of its schools.)

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

# Combination of CEP Schools and Non-CEP Schools

District:

FY

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14	Column 15	Column 16
School	Community Eligibility Option School (Y/N)	Grade Span	Total Enrollment	Pre-K Enrollment	Total Enrollment Minus Pre-K	If Column 2 = N, Total Free/Reduced Meals Count; If Column 2 =Y, TANF, SNAP Directly Certified	If Column 2 = N, PK Free/Reduced Meals Count; If Column 2 =Y, PK TANF, SNAP Directly Certified	Economically Disadvantaged Students Identified by Data for School Lunch Program Minus Pre-K (CEO or Household Applications)	Multiplier (1.6)	Column 10 * Column 9 if CEO =Y; Column 9 if CEO =N)	Number Used to Determine Percentage of Meals Paid by USDA (For CEO--Column 9 * Column 10; Otherwise, Column 9)	% of Economically Disadvantaged Students for Title I Allocation	% Directly Certified--Greene County Used to Determine the Rank Order for the LEA's Title I Schools	PPA	School Allocation PPA times Column 9
Lincoln	Y	9-12	425	0	425	400	0	400	1.6	640	425	100.00%	94.12%		\$0
Washington	N	6-8	500	0	500	475	0	475	N/A	475	475	95.00%	95.00%		\$0
Adams	Y	3-5	600	0	600	350	0	350	1.6	560	560	93.33%	58.33%		\$0
Jefferson	N	K-2	450	0	450	400	0	400	N/A	400	400	88.89%	88.89%		\$0
Madison	N	K-5	400	0	400	200	0	200	N/A	200	200	50.00%	50.00%		\$0
Monroe	N	6-8	500	0	500	100	0	100	N/A	100	100	20.00%	20.00%		\$0
District Total			2875	0	2875			1925			2160	75.13%	66.96%		0

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# LEAs with All Community Eligibility Schools

- If an LEA has all Community Eligibility schools, does it need to apply the 1.6 multiplier for Title I ranking and allocation purposes?
  - No. If an LEA has all Community Eligibility schools, the LEA may rank its schools by the percentage of directly certified students in each school, even though the multiplier is used to determine the USDA reimbursement amount.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gadoe.org](http://gadoe.org)

# All Community Eligibility Schools

District:

FY

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14	Column 15	Column 16
School	Community Eligibility Option School (Y/N)	Grade Span	Total Enrollment	Pre-K Enrollment	Total Enrollment Minus Pre-K	If Column 2 = N, Total Free/Reduced Meals Count; If Column 2 =Y, TANF, SNAP Directly Certified	If Column 2 = N, PK Free/Reduced Meals Count; If Column 2 =Y, PK TANF, SNAP Directly Certified	Economically Disadvantaged Students Identified by Data for School Lunch Program Minus Pre-K (CEO or Household Applications)	Multiplier (1.6)	Column 10 * Column 9 if CEO =Y; Column 9 if CEO =N)	Number Used to Determine Percentage of Meals Paid by USDA (For CEO--Column 9 * Column 10; Otherwise, Column 9)	% of Economically Disadvantaged Students for Title I Allocation	% Directly Certified--Greene County Used to Determine the Rank Order for the LEA's Title I Schools	PPA	School Allocation PPA times Column 9
ABC Co. High School	Y	9-12	985	0	985	495	0	495	1.6	792	792	80.41%	50.25%		\$0
ABC Co. Middle School	Y	6-8	958	0	958	573	0	573	1.6	916.8	917	95.70%	59.81%		\$0
ABC Co. Elem School	Y	3-5	618	0	618	398	0	398	1.6	636.8	618	100.00%	64.40%		\$0
ABC Co. primary School	Y	k-2	805	0	805	538	0	538	1.6	860.8	805	100.00%	66.83%		\$0
					0			0		0		#VALUE!	#DIV/0!		\$0
															\$0

Georgia Department of Education



# More Than One School at 100%

- If the application of the 1.6 multiplier results in more than one school at 100 percent poverty, must an LEA allocate the same per-pupil amount to each of these schools?
  - Not necessarily. At its discretion, an LEA may take into consideration the direct certification poverty percentage of each of these schools.

Under 34 C.F.R. § 200.78(c), an LEA is not required to allocate the same per-pupil amount to each participating school, as long as it allocates higher per-pupil amounts for schools with higher concentrations of poverty than to schools with lower concentrations of poverty. In the case of an LEA that has more than one Community Eligibility school at 100 percent poverty by virtue of the 1.6 multiplier but the schools have different direct certification percentages, the LEA may allocate a greater per-pupil amount for the 100 percent school with the higher percentage of directly certified students because the direct certification data indicate that the school has a higher concentration of poverty than the other 100 percent schools.



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

# More Than One School at 100%

- In other words, the direct certification data may be used to differentiate among multiple Community Eligibility schools with a 100 percent poverty rate. In order to differentiate among these schools based on the most current data, an LEA may wish to use annual direct certification data and update the rankings as appropriate even if the data are not updated during the four-year period for Community Eligibility purposes.
- To ensure that it complies with 34 C.F.R. § 200.78(c), an LEA must make sure that the 100 percent Community Eligibility schools receive at least as much per pupil as Community Eligibility and non-Community Eligibility schools with poverty rates below 100 percent.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

# More Than One School at 100%

- A non-Community Eligibility school with a 95 percent poverty rate may not receive more per-pupil funding than a Community Eligibility school with a 100 percent poverty rate by virtue of the 1.6 multiplier. To ensure that it complies with 34 C.F.R. § 200.78(c), an LEA must make sure that the 100 percent Community Eligibility schools receive at least as much per pupil as Community Eligibility and non-Community Eligibility schools with poverty rates below 100 percent.
- If two Community Eligibility schools have the same direct certification rate, they must be provided the same per-pupil allocation.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

# More Than One School at 100%

District:

FY

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14	Column 15	Column 16
School	Community Eligibility Option School (Y/N)	Grade Span	Total Enrollment	Pre-K Enrollment	Total Enrollment Minus Pre-K	If Column 2 = N, Total Free/Reduced Meals Count; If Column 2 = Y, TANF, SNAP Directly Certified	If Column 2 = N, PK Free/Reduced Meals Count; If Column 2 = Y, PK TANF, SNAP Directly Certified	Economically Disadvantaged Students Identified by Data for School Lunch Program Minus Pre-K (CEO or Household Applications)	Multiplier (1.6)	Column 10 * Column 9 if CEO = Y; Column 9 if CEO = N	Number Used to Determine Percentage of Meals Paid by USDA (For CEO--Column 9 * Column 10; Otherwise, Column 9)	% of Economically Disadvantaged Students for Title I Allocation	% Directly Certified--Greene County Used to Determine the Rank Order for the LEA's Title I Schools	PPA	School Allocation PPA times Column 9
Miller Middle	Y	6-8	342	0	342	228	0	228	1.6	364.8	342	100.00%	66.67%	670	\$152,760
JKL County High	Y	9-12	545	0	545	314	0	314	1.6	502.4	502	92.18%	57.61%	24	\$7,536
2nd Street Elementary	Y	K-5	642	120	522	481	98	383	1.6	612.8	522	100.00%	73.37%	998	\$382,234
Big Apple Elementary	Y	K-7	364	0	364	251	0	251	1.6	401.6	364	100.00%	68.96%	962	\$241,462
Lake Wobegone Elementary	Y	K-8	321	22	299	44	5	39	1.6	62.4	62	20.87%	13.04%	0	\$0
					0			0		0		#VALUE!	#DIV/0!		
					0			0		0		#VALUE!	#DIV/0!		
					0			0		0		#VALUE!	#DIV/0!		
District Total			2214	142	2072			1215			1793	86.53%	58.64%		

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# LEAs Electing to Group Community Eligibility Schools

- If an LEA chooses to group Community Eligibility schools to determine the reimbursement rate from USDA, does each school in a group then have the same poverty percentage for Title I ranking and allocation purposes?
  - No. Schools may be grouped to determine the USDA reimbursement rate. Under section 1113 of the ESEA, however, an LEA with an enrollment of at least 1,000 students must rank schools individually for ranking and allocation purposes. Thus, if an LEA groups schools in order for them to be eligible for Community Eligibility or to maximize Community Eligibility reimbursement, the LEA must still use the Community Eligibility data, either alone or multiplied by the 1.6 multiplier, for each individual school for Title I ranking and allocation purposes.



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

# LEAs Electing to Group Community Eligibility Schools

For example:

- School 1 has 425 enrolled students, of whom 400 are directly certified. By virtue of the 1.6 multiplier, the school's poverty rate is 100 percent (400 directly certified students x the 1.6 multiplier = 640 (greater than the school's enrollment of 425 students)).
- School 2 has 600 students, of whom 350 are directly certified. By virtue of the 1.6 multiplier, the school's poverty rate is 93 percent (350 directly certified students x the 1.6 multiplier = 560 divided by the enrollment of 600 = 93 percent).
- For USDA reimbursement, the LEA may combine the data for School 1 and School 2, resulting in a reimbursement rate of 100 percent for the schools as a group. (The reimbursement rate is 100 percent because: 750 directly certified students divided by the enrollment of 1,025 = 73.1 percent x 1.6 = 100 percent reimbursement.)
- For Title I ranking and allocation purposes, however, the LEA must use the individual school percentages (School 1 = 100 percent; School 2 = 93 percent).



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

# Cutoff Above Which Title I-Eligible Schools Are Served

- If an LEA has traditionally established a cutoff above which Title I-eligible schools are served, does the LEA have any options if the use of Community Eligibility data increases the number of schools above the cutoff?
  - Yes, an LEA has several options. One option, and perhaps the most straightforward option, is for an LEA to raise its cutoff point. For example, if an LEA's policy was to serve all schools above 60 percent poverty, the LEA could choose to serve schools above a higher poverty percentage (e.g., 67 percent).
  - For the sole purpose of within-district Title I allocations, a second option would be for an LEA to use, as authorized by section 1113(a)(5) of the ESEA, another allowable poverty measure or combination of measures to rank its schools that might result in fewer schools above its cutoff.

# Equitable Services



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

- Does Community Eligibility change the guidance [*Title I Services to Eligible Private School Children* (Oct. 17, 2003)] on how an LEA allocates Title I funds to provide equitable services to eligible private school students?
  - No. The requirements described in that guidance have not changed. This guidance describes how the requirements can be met when NSLP data are comprised in whole or in part of Community Eligibility data.

Georgia Department of Education



# Equitable Services



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- Is an LEA's collection of poverty data on private school students affected by Community Eligibility data?
  - Possibly. After consultation and considering the views of private school officials, an LEA must identify the method it will use to determine the number of private school children from low-income families who reside in participating public school attendance areas. These methods include: (1) using the same poverty measure used by the LEA to count public school students (e.g., NSLP data); (2) using comparable poverty data from a survey of private school families and extrapolating the results from a representative sample if complete actual data are unavailable; (3) using comparable poverty data from a different source; (4) applying the low-income percentage of each participating public school attendance area to the number of private school students who reside in each area (i.e., proportionality); and

# Equitable Services



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[gaode.org](http://gaode.org)

(5) using an equated measure of low income correlated with the measure of low income used to count public school students. (See section 1120(c)(1) of the ESEA; 34 C.F.R. § 200.78(a)(2).) The method an LEA selects, after consultation with private school officials, will determine whether Community Eligibility data are relevant.

Georgia Department of Education

# Equitable Services



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- If a private school is a Community Eligibility school, does every child in the private school automatically generate Title I funds for equitable services?
  - No. As indicated in Section B of the Title I Equitable Services Guidance, Title I funds are generated to provide equitable services to eligible private school students on the basis of private school students from low-income families who reside in participating public school attendance areas and not on the basis of all students in a private school. Accordingly, even if a private school is a Community Eligibility school and all students in the school qualify for free meals, only those students who reside in a participating public school attendance area would generate funds with which an LEA would provide equitable services. If an LEA counts only directly certified students in participating public school attendance areas for Title I allocations to public schools, then only directly certified students in a Community Eligibility private school who reside in those areas would generate funds for equitable services.

# Equitable Services



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[gaode.org](http://gaode.org)

- After consultation with private school officials, if an LEA chooses to use proportionality to calculate the amount generated for equitable services and a Community Eligibility public school's poverty percentage for within-district Title I allocations is 100 percent, will every student in the private school that resides within the school's attendance area generate funds for equitable services?

➤ Yes.

Georgia Department of Education

# Title I Accountability



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- How does Community Eligibility affect Title I accountability?
  - To meet some reporting and accountability requirements, an SEA or LEA must have data on individual economically disadvantaged students. For example, each SEA and LEA that receives funding under Title I must assess and report annually on the extent to which the subgroup of economically disadvantaged students is making progress toward meeting the State's academic achievement standards in reading/language arts, mathematics, and science. Moreover, an LEA must hold schools accountable for the achievement of this subgroup, whether under section 1116 of the ESEA or under ESEA flexibility for those States with an approved ESEA flexibility request.

Georgia Department of Education

# Title I Accountability



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- How does Community Eligibility affect Title I accountability?
  - Finally, under section 1116 of the ESEA, an LEA must offer priority for public school choice to economically disadvantaged students in any school identified for improvement, corrective action, or restructuring and supplemental educational services to any economically disadvantaged student who attends a school that is in the second year of school improvement, in corrective action, or in restructuring (these requirements have been waived under ESEA flexibility). For most LEAs, NSLP data, including Community Eligibility data, may be the best source to identify individual economically disadvantaged students.

Georgia Department of Education

# Title I Accountability



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- How may economically disadvantaged students in a Community Eligibility school be identified for accountability?
  - Although for NSLP purposes a Community Eligibility school may maintain the same reimbursement rate over four years and therefore would not need to update its direct certification count, an SEA may wish its LEAs to use the most recently available direct certification data for other purposes, such as Title I. One such Title I purpose is the disaggregation of assessment data by the economically disadvantaged subgroup for reporting and accountability.

Georgia Department of Education

# Title I Accountability



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- With respect to this purpose, an SEA may prefer to include only identified students to ensure that the subgroup includes only students who are economically disadvantaged. Accordingly, an SEA may decide that only directly certified students would be eligible for any services for which eligibility is based on poverty (such as SES under section 1116 of the ESEA). To the extent that survey data are available, the SEA may also use those data to identify students in the economically disadvantaged subgroup.



# Title I Accountability



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

- Finally, because Community Eligibility schools generally have higher poverty levels than other schools and consequently have a smaller number of students who would not be deemed economically disadvantaged if poverty data were available for each student in the school, an SEA may elect to base reporting and accountability on all students in a Community Eligibility school. In this case, the economically disadvantaged subgroup would be the same as the "all students" group and all students in the school would then be eligible for any services for which eligibility is based on poverty.

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[ga DOE.org](http://ga DOE.org)

# Things That Have Not Changed

- LEAs must annually, rank without regard to grade spans. Eligible school attendance areas in which the concentration of children from low-income families that exceeds 75 percent from highest to lowest according to the percentage of children from low-income families.
- LEAs must serve eligible school attendance areas in rank order.
- LEAs may either rank schools districtwide or by grade span grouping.

# What Questions Do You Have?



# Title I, Part A Program Specialists' Contact Information



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

Area	Name	Office Telephone	Email
1	Robyn Planchard	(404) 985-3808	rplanchard@doe.k12.ga.us
2	Randy Phillips	(770) 221-5232	rphillips@doe.k12.ga.us
3	Anthony Threat	(706) 615-0367	anthony.threat@doe.k12.ga.us
4	Evelyn Maddox	(404) 975-3145	emaddox@doe.k12.ga.us
5	Judy Alger	(229) 321-9305	jualger@doe.k12.ga.us
6	Grace McElveen	(912) 334-0802	gmcelveen@doe.k12.ga.us
7	Jimmy Everson	(229) 723-2664	jeverson@doe.k12.ga.us

Georgia Department of Education



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga.doe.org](http://ga.doe.org)

# Title I, Part A Program Specialists' Contact Information

Area	Name	Office Telephone	Email
8	Marijo Pitts-Sheffield	(912) 269-1216	mpitts@doe.k12.ga.us
9	Kathy Pruett	(706) 540-8959	kpruett@doe.k12.ga.us
10	Elaine Dawsey	(478) 971-0114	edawsey@doe.k12.ga.us
11	Olufunke Osunkoya	(678) 704-3557	oosunkoya@doe.k12.ga.us
12	Bobby Trawick	(229) 246-1976	btrawick@doe.k12.ga.us
13	Ken Banter	(478) 960-2255	kbanter@doe.k12.ga.us
14	Tammy Wilkes	(478) 237-2873	twilkes@doe.k12.ga.us

Georgia Department of Education

# Presenters



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga.doe.org](http://ga.doe.org)

Jennifer Davenport, Ed.D.  
Title I, Part A Program Manager  
School Improvement – Federal Programs  
Georgia Department of Education  
[jedavenp@doe.k12.ga.us](mailto:jedavenp@doe.k12.ga.us)  
(404) 463-1955

Margo DeLaune  
Title Programs Director  
School Improvement – Federal Programs  
Georgia Department of Education  
[mdelaune@doe.k12.ga.us](mailto:mdelaune@doe.k12.ga.us)  
(404) 657-1796

# Community Eligibility Provision (CEP), Title I, and Accountability

2015 GCEL Annual Conference  
March 2 - 4, 2015