

# Determining Your Eligible Attendance Areas and Ensuring Correct Rank Order of Schools (CEP, FLP, Title I)

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#### **Presenters**

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#### **SCHOOL IMPROVEMENT & DISTRICT EFFECTIVENESS**



#### Purpose



To review how local educational agencies (LEAs) identify eligible Title I school attendance areas and schools and allocate funds to those attendance areas and schools based on the requirement in Title I, part A, section 1113 of the Elementary and Secondary Education Act of 1965 (ESEA)

#### Agenda



- Identifying Title I Eligible Attendance Areas
- Selecting Title I Eligible Attendance Areas
- Allocating Funds To Title I Eligible Attendance Areas





#### What is an Eligible Attendance Area?

- It is an attendance area that qualifies for Title I services based on its ranking according to poverty data
- LEA must rank all of its school attendance areas (the geographic area from which a public school draws its children) according to their percent of poverty





#### An LEA must use the same measure of poverty for:

- Identifying eligible school attendance areas
- Determining the ranking of each area
- Determining the allocation for each area

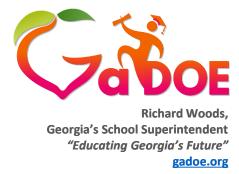




The LEA must select a poverty measure from the following five options:

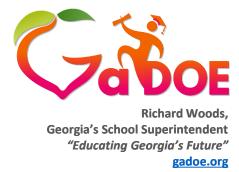
- Children ages 5-17 in poverty as counted in the most recent census data approved by the Secretary
- Children eligible for free and reduced-meals (FRM)under the Richard B. Russell National School Lunch Act \*Note: CEP and associated direct certification (SNAP/TANF) are considered a part of the national school lunch program.





- Children in families receiving assistance under the State program funded under Title IV, Part A of the Social Security Act, Temporary Assistance for Needy Families (TANF)
- Children eligible to receive medical assistance under the Medicaid program
- A composite of any of the above measures





\* In order for LEAs to arrive at an accurate number:

An LEA must rank school attendance areas based on the <u>percentage</u> (not the number) of low-income children counted



## For Schools Using Household Applications

**Enrollment Data:** 

**Information to gather per School Attendance Area** 

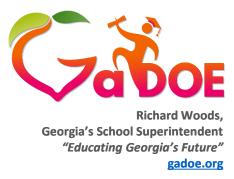




#### What information do I need to gather per school attendance area?

- School Enrollment Data, October 2013 Student Enrollment by Grade Level (Pre-K-12), October 1, 2013 (FTE 2014-1)
   Enrollment by Grade Level
- Pre-K Enrollment, October 2013
   Enrollment by Grade





#### What information do I need to gather per School attendance area?

 Free or Reduced Meals (FRM) Per School, October 1, 2013 (FTE 2014-1)

Free or Reduced Meals (FRM) Eligibility

Pre-K Free and Reduced (FRM) Meals,
 October 2013

### Where Do I Enter the Information?

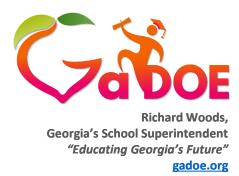


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• Eligible Attendance Area Worksheet



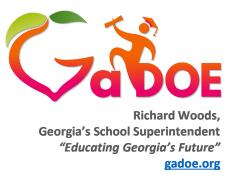
## What if attendance zones change?



Attendance zones may change due to:

- Closing schools
- Opening new schools
- Realignment of grade spans at schools
- Redistricting attendance zones

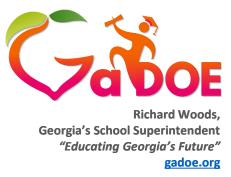
### Redistricting Attendance Zones



Two options for determining eligible Title I attendance areas:

- 1. Use actual October FTE data from the year the redistricting occurs
  - The Public School Allocations tab within the consolidated application could not be completed until the October FTE data is verified at the district level
  - This FTE data would be used for two consecutive years unless redistricting occurs again during that same year

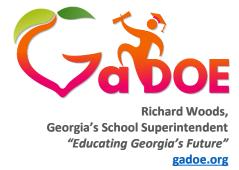
### Redistricting Attendance Zones



Two options for determining eligible Title I attendance areas:

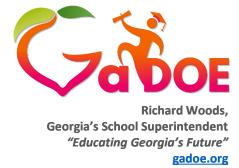
- 2. Use adjusted FTE data from the year prior to redistricting
  - Students remain in the grade level where they are counted for FTE
  - Students are reassigned to the school they would attend if the new attendance zone pattern was in place during this school year
  - Free/Reduced meal eligibility is determined for each school based on the actual students assigned to the school





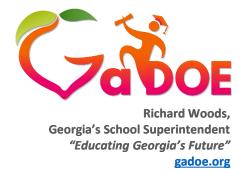
After an LEA has ranked all of its school attendance areas by poverty, the LEA **must** first serve, in rank order of poverty, its schools above 75-percent poverty, including any middle schools or high schools





Only after an LEA has served all of its schools with a poverty rate above 75-percent may the LEA serve lower-ranked schools

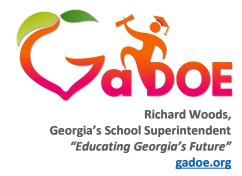




#### The LEA has the option to:

- Continue on with the districtwide ranking, or
- Rank remaining areas by grade span groupings



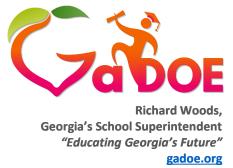


The same districtwide poverty average must be used if the LEA

selects the option of continuing on with the districtwide ranking

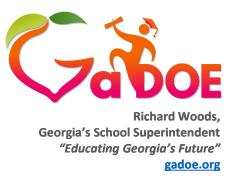
\*(Districts must not select schools below the district average unless the school has a poverty percentage of 35-percent or higher)





If an LEA has no school attendance areas above 75-percent poverty, the LEA may rank districtwide or by grade span groupings

## **Grade Span Grouping Defined**



#### An LEA's organization of its schools defines its grade span groupings

- For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade span groupings would be grades K-5, 6-8, and 9-12
- To the extent an LEA has schools that overlap grade spans (e.g., K-5, K-8, 6-8), the LEA should include a school in the grade span in which it is most appropriate

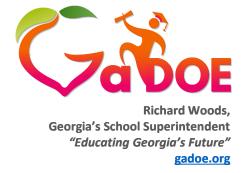




#### For ranking by grade span groupings, the LEA may use:

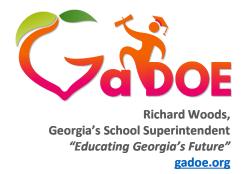
- The districtwide poverty average, or
- The districtwide grade span poverty averages for the relevant grade span grouping





An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to rank its school attendance areas





#### An LEA may

 Designate as eligible any school attendance area or school in which at least 35-percent of the children are from

low-income families--i.e., the 35-percent rule





#### An LEA may

- For one additional year only, designate and serve a school attendance area or school that is no longer eligible but was eligible and served in the preceding year
- Note: A grandfathered school does not trigger the 125percent rule; however, rank order must be maintained





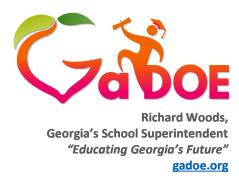
- Jones School received Title I services last year
- The District's free or reduced meals (FRM) average for this year's application is 37-percent (The district uses districtwide ranking)
- Jones School's free or reduced meals (FRM) average is
   34-percent for this year's application data
- Jones School may receive services for one additional year

## Allocating Title I Funds to Participating Areas and Schools



An LEA must allocate Title I, Part A funds to participating school attendance areas or schools, in rank order, based on the total number of children from low-income families in each area or school

## Allocating Title I Funds to Participating Areas and Schools



- An LEA is not required to allocate the same per-child amount to each area or school
- However, the LEA must allocate a higher per-child amount to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates

## Allocating Title I Funds to Participating Areas and Schools



- An LEA that opts to serve schools below 75-percent poverty using grade span groupings may determine different perchild amounts for different grade spans so long as those amounts do not exceed the amount allocated to any area or school above 75-percent poverty
- Per-child amounts within grade spans may also vary so long as the LEA allocates higher per-child amounts to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates





Ranking of Schools In A School District On A Districtwide
 Basis

Ranking of Schools In A School District By Grade Span

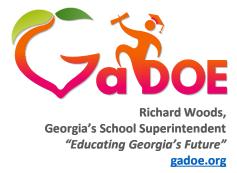




#### When an LEA elects to use the feeder pattern, the LEA may

- Determines the districtwide average of poverty based on all of the schools for which the district is using actual poverty data; and
- Uses this districtwide average to rank all of the attendance areas or schools in the district





If an LEA serves attendance areas or schools below a 35percent poverty rate, the district's allocation per low-income child must be based on the actual number of low-income children in the feeder schools, and the projected number in the feeder pattern receiving schools

#### **Feeder Patterns**



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**EXAMPLE OF FEEDER PATTERN** 





#### What is the 125-Percent rule?

■ If an LEA serves any areas or schools below 35-percent poverty, the LEA must allocate to <u>all</u> its participating areas or schools an amount for each low-income child in each participating school attendance area or school that is at least 125-percent of the LEA's allocation per low-income child

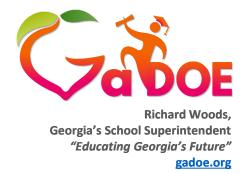




#### What is the 125-Percent rule?

An LEA's allocation per low-income child is the total LEA allocation under Title I, Part A, subpart 2 divided by the number of low-income children in the LEA as determined using the poverty measure selected by the LEA to identify eligible school attendance areas. The LEA then multiplies this per-child amount by 125-percent





- The LEA's allocation per low-income child under Title I, Part A, subpart 2 is \$2,000,000
- The allocation is divided by the number of low-income children in the LEA using the poverty measure selected by the LEA to identify eligible school attendance areas: 2375

(\$2,000,000/2375 = \$842.11)





■ The LEA then multiplies this \$842.11 per-child amount by 125-percent

■ The amount spent on each child (PPA) in participating attendance areas must be a minimum of \$1,053.00

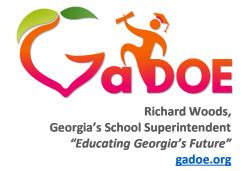


## The Community Eligibility Provision and Title I, Part A

**LEA/School Using Community Eligibility: Guidance and Selection Requirements** 

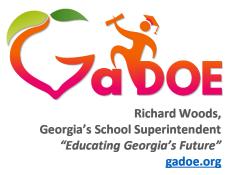


## Healthy, Hunger-Free Kids Act of 2010 (Act)



With the passage of the Healthy, Hunger-Free Kids Act of 2010 (Act) [available at: <a href="www.gpo.gov/fdsys/pkg/PLAW-111publ296.pdf">www.gpo.gov/fdsys/pkg/PLAW-111publ296.pdf</a>] the National School Lunch Program (NSLP) now includes a new universal meal program, the Community Eligibility Provision (Community Eligibility or CEP), which is being phased in over several years by the U.S. Department of Agriculture (USDA)

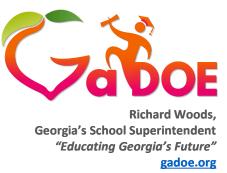
### Community Eligibility Provision



### What is the Community Eligibility Provision (CEP)?

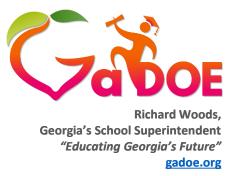
Section 104(a) of the Healthy, Hunger-Free Kids Act of 2010 (Act) amended section 11(a)(1) of the Richard B. Russell National School Lunch Act to provide an alternative that eliminates the need for household applications for free and reduced-price meals in high-poverty LEAs and schools. This alternative, which is now part of the NSLP, is referred to as the Community Eligibility Provision (Community Eligibility or CEP)

### **Community Eligibility Provision**



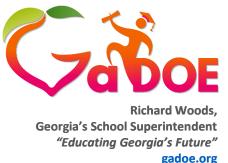
Community Eligibility permits eligible schools to provide meal service to all students at no charge, regardless of economic status, while reducing the burden at the household and local levels by eliminating the need to obtain eligibility data from families through a separate collection

### **Community Eligibility Provision**



- Community Eligibility schools 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 for schools lunches provided by USDA
- They do not rely on annual household applications that are generally used to determine eligibility for free and reduced meals (FRM)

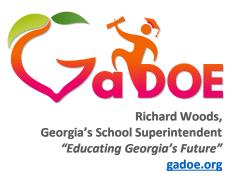
### Community Eligibility Provision



A school is <u>eligible</u> for the Community Eligibility if **at least 40 percent** of its students are "directly certified", i.e., identified for free meals through means other than household applications (for example, students directly certified through SNAP)

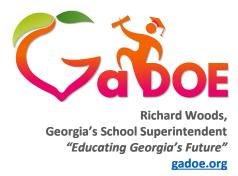
**Note:** The 40-percent threshold may be determined school-by-school, by a group of schools with the LEA, or in the aggregate for the entire LEA. A percentage of 39.98 percent does **NOT** meet the threshold

### **Community Eligibility Provision**



To account for low-income families not reflected in the direct certification data, USDA sets meal reimbursement levels for Community Eligibility 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)

### Community Eligibility Provision



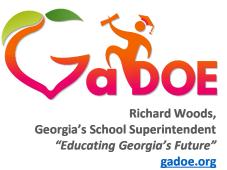
Under Community Eligibility, schools must renew their direct certification numbers once every four years to maintain eligibility. However, schools are encouraged to update their direct certification numbers annually to capture more current information

### Community Eligibility Provision



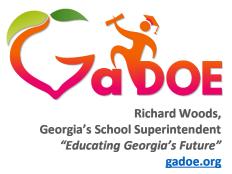
If the <u>most current data show an increase</u> in the percentage of enrolled students who are directly certified, the school may use that percentage for determining USDA reimbursement; if the <u>data show a decrease</u>, the school may continue to use the original percentage for the remainder of the four-year eligibility period

### **Community Eligibility Provision**



Under section 1113 of the ESEA, an LEA must rank its school attendance areas or schools based on the percentage of economically disadvantaged students to determine a school's eligibility to receive Title I funds, to allocate funds to selected schools, and to calculate the amount generated for Title I services to eligible private school students

### **Community Eligibility Provision**



In terms of accountability, each SEA and LEA that receives funding under Title I must assess and report annually on the extent to which economically disadvantaged students are making progress toward meeting State academic achievement standards in reading or language arts and mathematics

### Community Eligibility Provision



Moreover, an LEAs must hold schools accountable for the achievement of student subgroups, whether under section 1116 of the ESEA or under ESEA flexibility for those states with an approved ESEA flexibility request

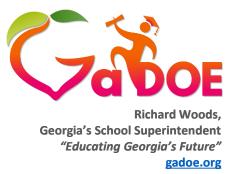
To meet these requirements, an LEA must have school-level data on individual economically disadvantaged students. For many LEAs, NSLP data are likely to be the best source to identify those students

## Implementation of the Community Eligibility Provision



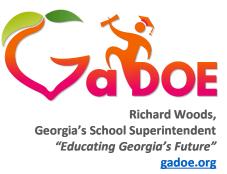
- Implementation began in the 2011–2012 school year in local educational agencies (LEAs) in Illinois, Kentucky, and Michigan
- In the 2012–2013 school year, the USDA added the District of Columbia, New York, Ohio, and West Virginia
- In the 2013–2014 school year, Community Eligibility became available in Maryland, Massachusetts, Florida and Georgia
- The option will be available to all states in the 2014–2015 school year

### **Community Eligibility Provision**



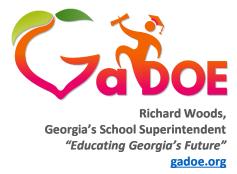
To be eligible, LEAs and/or schools must meet a minimum level of "identified students" for free meals in the year prior to implementing Community Eligibility; agree to serve free breakfasts and lunches to all students; and agree to cover with non-federal funds any costs of providing free meals to students above the amounts provided by federal assistance

### **Community Eligibility Provision**



Reimbursement for each LEA or school is based on claiming percentages derived from the percentage of identified students, i.e., students certified for free meals through means other than individual household applications. The claiming percentages established in the first year for an LEA or school may be used for four school years and may be increased if the percentage of identified students rises for the LEA or school

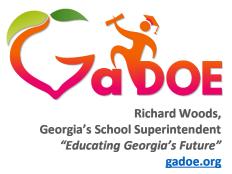




What does the term "Identified students" mean?

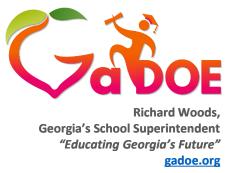
"Identified students" are students approved as eligible for free meals who are not subject to verification (i.e., in Community Eligibility schools, "directly certified" children)





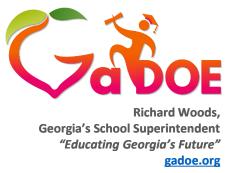
This definition includes students directly certified through SNAP, TANF, or the food Distribution Program on Indian Reservations; children experiencing homelessness and on the local liaison's list; Head Start children; migrant youth; runaways; and non-applicants approved by local officials. Foster children who are certified through means other than household application and students who are certified for free meals based on a letter provided by SNAP to the household are also included





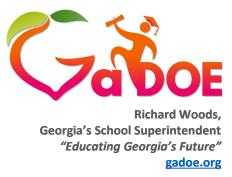
The practice of directly certifying students is not new to the NSLP, as direct certification data previously have been used in conjunction with household applications to determine the amount of Federal reimbursement a school receives. Under Community Eligibility, however, a primary difference is that a Community Eligibility school uses only direct certification data on identified students and no longer collects any household applications to determine the amount of federal reimbursement





For Title I purposes, the relevant Community Eligibility percentage of identified students and direct certification data combined with household applications in non-Community Eligibility schools are all considered NSLP data under the Richard B. Russell National School Lunch Act. That is, these forms of NSLP data qualify as eligible poverty data for Title I purposes under section 1113(a)(5) of the ESEA, which lists the poverty measures that an LEA may use for Title I within-district allocations

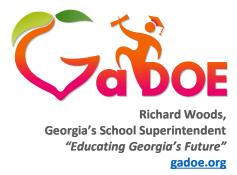




### What is the eligibility threshold for participation in Community Eligibility?

• Eligibility is determined for an entire LEA, a group of schools within an LEA, or a single school within an LEA. To be eligible to participate in Community Eligibility, the percentage of identified students must be at least 40-percent of enrollment. An LEA may have some schools that participate in Community Eligibility and others that do not





### How is the percentage of identified students calculated for Community Eligibility?

The percentage of identified students is calculated by dividing the number of identified students by the students enrollment as of April 1st of the previous school year. (Note: the April 1st date is for the purpose of meal reimbursement)





### What is the function of the 1.6 multiplier?

- The function of the 1.6 multiplier is to provide an estimate of the percentage of students eligible for free and reduced meals (FRM) in participating Community Eligibility schools, groups of schools, or LEAs that is comparable to the poverty percentage that would be obtained in a non- Community Eligibility school
- The number of students directly certified is a subset of the total number of students eligible for free and reduced meals (FRM). Using only the number of directly certified students would result in lower poverty percentages for Community Eligibility schools or LEAs





#### Will the 1.6 multiplier change?

■ The Act requires that the multiplier remain at 1.6 through June 30, 2014. After this date, USDA has the authority to change the multiplier to a number between 1.3 and 1.6. Any change to the multiplier would be communicated by USDA well in advance of the effective date of the change. Schools and LEAs that elect Community Eligibility keep the same multiplier throughout the four-year Community Eligibility cycle

## Intersection between Community Eligibility and Title I, Part A



- There are several aspects of Title I that require the use of poverty data at the school or individual student level: within-district allocations, equitable services for eligible private school students, within-state allocations, and accountability
- NSLP data are often used as an indicator of poverty to help carry out Title I programs; therefore, the decision to participate in Community Eligibility could also affect an LEA's poverty data for Title I purposes





### **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 <u>later than April 1<sup>st</sup> of the prior</u> year





### Issues under the Community Eligibility Provision (CEP):

■ 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

### Poverty Measure for Title I, Part A



#### Issues under the Community Eligibility Provision(CEP):

If a school within a district using the Community Eligibility does not qualify for this option, those schools will continue to use the household applications for free or reduced meals (FRM). In this case, a school will still continue to use the household application counts to determine a school's Title I allocation

### **Example**

Within-District Title I Allocations for a Local Educational Agency with a Combination of Community Eligibility Schools and Non-Community Eligibility Schools



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Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9
School	Community Eligibility Option School (Y/N)	Enrollment - PreK	Economically- Disadvantage d Students Identified by Data for School Lunch Program* Minus Pre-K	Multiplier**	Number Used to Determine Percentage of Meals Paid by USDA***	Percentage of Economically- Disadvantaged Students for Title I Allocations***	Per-Pupil Amount Used by LEA	Title I Allocation**** *
Lincoln	Y	425	400	1.6	425	100%	\$500	\$212,500
Washington	N	500	475	N/A	475	95%	\$500	237,500
Adams	Y	600	350	1.6	560	93%	\$500	280,000
Jefferson	N	450	400	N/A	400	89%	\$450	180,000
Madison	N	400	200	N/A	200	50%	\$450	90,000
Monroe	N	500	100	N/A	100	20%	N/A	0
Total	N/A	2,875	N/A	N/A	2,160	71%	N/A	\$1,000,000

<sup>\*</sup> The number of students may be determined once every four years for Community Eligibility schools. Moreover, the poverty data used will likely differ from other schools. For the Community Eligibility schools, the poverty data would be, for example, direct certification (Identified Students) data (e.g., SNAP or TANF) collected at least every four years times the multiplier. For other schools, the poverty data might be from FRM (Household) applications collected every year or a combination of direct certification and FRM (Household) applications collected every four years.

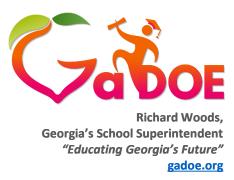
<sup>\*\*</sup> The multiplier applies only to a Community Eligibility school.

<sup>\*\*\*</sup> For a Community Eligibility school, the Column 6 figure is equal to the lesser of (1) Column 4 x Column 5 or (2) Column 3. In other words, this number may not exceed the school's total enrollment. For the other schools, the Column 6 figure is equal to Column 4.

<sup>\*\*\*\*</sup>Column 6 / Column 3.

<sup>\*\*\*\*\*</sup>Column 8 x Column 6 (Note: Monroe is ineligible for Title I funds because its poverty percentage is below both the LEA's average and 35 percent.)

## 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 75percent 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



If an LEA applies the 35-percent rule, must all school attendance areas with at least 35-percent poverty be served?

#### No.

However, school attendance areas to be served must be selected in rank order



May an LEA allocate a greater per-pupil amount, for example, to schoolwide program schools than to targeted assistance schools since schoolwide programs serve all children in the school?

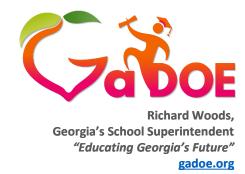
No



Is there a maximum amount that an LEA may reserve?

#### No

An LEA must bear in mind, however, that the goal of Part A is to enable participating children to make adequate progress toward meeting the challenging student achievement standards that all children are expected to meet



How may preschool children be served under Part A?

- A participating school may use part of its Part A funds to operate a preschool program or
- An LEA may reserve an amount from the LEA's total allocation to operate a Title I, Part A preschool program for eligible children in the district as a whole or for a portion of the district



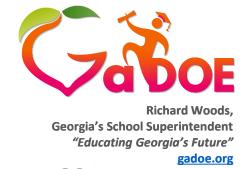
How does an LEA handle funds that are carried over from one year into the next when allocating funds to school attendance areas?

Allocate the funds to schools by increasing the per pupil amount maintaining rank order, basing that amount on the total number of children from low-income families in each area or school



How does an LEA handle funds that are carried over from one year into the next when allocating funds to school attendance areas?

Allocate the funds back to the school that earned the dollars and give that school an opportunity to spend the funds. The LEA must ask the school for a plan to spend such funds



How does an LEA handle funds that are carried over from one year into the next when allocating funds to school attendance areas?

Allocate the funds for district level activities –
for example, professional development. LEAs
implementing this option must ensure that
private schools have equitable participation,
if appropriate



Richard Woods, Georgia's School Superintendent "Educating Georgia's Future" gadoe.org

How does an LEA handle funds that are carried over from one year into the next when allocating funds to school attendance areas?

Allocate the funds back to all the schools on an equal basis and give each school an opportunity to spend the funds. The LEA must ask the school for a plan to spend such funds. For example, \$8,000 are available from carry-over and the district has a total of two Title I schools, each school would receive \$4,000 each



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### **Questions and Answers**

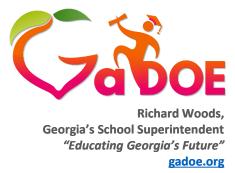
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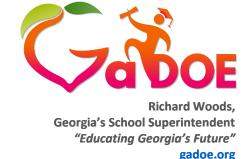
3/20/2015 78

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3/20/2015 79



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# Determining Your Eligible Attendance Areas and Ensuring Correct Rank Order of Schools (CEP, FLP, Title I)

**2015 GCEL Annual Conference** 

March 2 - 4, 2015