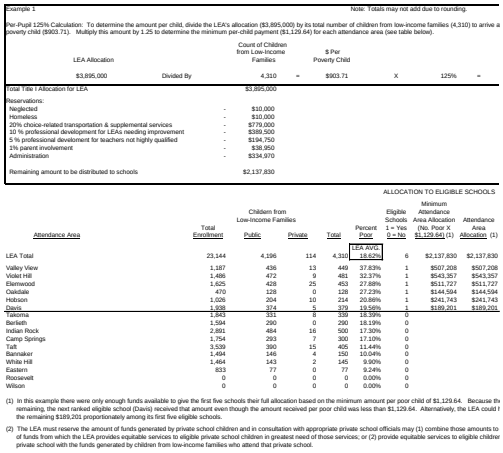
NON-REGULATORY GUIDANCE

LOCAL EDUCATIONAL AGENCY IDENTIFICATION AND SELECTION OF SCHOOL ATTENDANCE AREAS AND SCHOOLS AND ALLOCATION OF TITLE I FUNDS TO THOSE AREAS AND SCHOOLS



Example 1 — Note: Totals may not add due to rounding.

Per-Pupil 125% Calculation: To determine the amount per child, divide the LEA's allocation ($3,895,000) by its total number of children from low-income families (4,310) to arrive a poverty child ($903.71). Multiply this amount by 1.25 to determine the minimum per-child payment ($1,129.64) for each attendance area (see table below).

LEA Allocation		Count of Children from Low-Income Families		$ Per Poverty Child			
$3,895,000	Divided By	4,310	=	$903.71	X	125%	=

Total Title I Allocation for LEA		$3,895,000
Reservations:		
Neglected	-	$10,000
Homeless	-	$10,000
20% choice-related transportation & supplemental services	-	$779,000
10 % professional development for LEAs needing improvement	-	$389,500
5 % professional develoment for teachers not highly qualified	-	$194,750
1% parent involvement	-	$38,950
Administration	-	$334,970
Remaining amount to be distributed to schools		$2,137,830

ALLOCATION TO ELIGIBLE SCHOOLS

	Attendance Area	Total Enrollment	Children from Low-Income Families: Public	Private	Total	Percent Poor	Eligible Schools 1 = Yes 0 = No	Minimum Attendance Area Allocation (No. Poor X $1,129.64) (1)	Attendance Area Allocation (1)
						LEA AVG. 14.62%			
	LEA Total	23,144	4,196	114	4,310		6	$2,137,830	$2,137,830
clipper	Valley View	1,187	436	13	449	37.83%	1	$507,208	$507,208
method	Violet Hill	1,486	472	9	481	32.37%	1	$543,357	$543,357
basket	Elmwood	1,625	428	25	453	27.88%	1	$511,727	$511,727
Wood	Oakdale	470	128	0	128	27.23%	1	$144,594	$144,594
smart	Hobson	1,026	204	10	214	20.86%	1	$241,743	$241,743
low	Davis	1,938	374	5	379	19.56%	1	$189,201	$189,201
tonnage	Takoma	1,843	331	8	339	18.39%	0		
pelican	Berleth	1,594	290	0	290	18.19%	0		
shell	Indian Rock	2,891	484	16	500	17.30%	0		
sandy	Camp Springs	1,754	293	7	300	17.10%	0		
sea	Taft	3,539	390	15	405	11.44%	0		
lake	Bannaker	1,494	146	4	150	10.04%	0		
ocean	White Hill	1,464	143	2	145	9.90%	0		
wild	Eastern	833	77	0	77	9.24%	0		
wave	Roosevelt	0	0	0	0	0.00%	0		
gull	Wilson	0	0	0	0	0.00%	0		

(1) In this example there were only enough funds available to give the first five schools their full allocation based on the minimum amount per poor child of $1,129.64. Because the remaining, the next ranked eligible school (Davis) received that amount even though the amount received per poor child was less than $1,129.64. Alternatively, the LEA could h the remaining $189,201 proportionately among its first five eligible schools.

(2) The LEA must reserve the amount of funds generated by private school children and in consultation with appropriate private school officials may (1) combine those amounts to of funds from which the LEA provides equitable services to eligible private school children in greatest need of those services; or (2) provide equitable services to eligible childre private school with the funds generated by children from low-income families who attend that private school.

U.S. Department of Education
Office of Elementary and Secondary Education

August 2003

Local Educational Agency Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools

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Local Educational Agency Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools

INTRODUCTION

This guidance outlines how local educational agencies (LEAs) identify eligible Title I school attendance areas and schools and allocate funds to those attendance areas and schools. This guidance reflects the requirements in Title I, Part A, section 1113 of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act, and §§200.77 and 200.78 of the Title I regulations published in the Federal Register on December 2, 2002.

This guidance is nonbinding, but compliance with it will be deemed by the Department, including the Inspector General, as compliance with applicable statute and regulations. Although this document outlines specific steps in the allocation process and provides examples illustrating how certain procedures may be carried out, the examples provided should not be regarded as exhaustive or limiting. LEAs may develop alternative approaches that are consistent with the Title I statute and regulations, but are more in keeping with their particular needs and circumstances.

LEA IDENTIFICATION AND SELECTION OF SCHOOL ATTENDANCE AREAS AND SCHOOLS AND ALLOCATION OF TITLE I FUNDS TO SCHOOL ATTENDANCE AREAS AND SCHOOLS

The following points summarize the requirements of Section 1113 of the Title I statute and §§200.77 and 200.78 of the Title I regulations for identifying eligible school attendance areas and selecting those eligible areas that will participate in Title I, Part A, and allocating Part A funds to participating areas:

General Selection Requirements

1. An 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 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-priced lunches under the Richard B. Russell National School Lunch Act.

        - 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).

        - Children eligible to receive medical assistance under the Medicaid program.

        - A composite of any of the above measures.

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

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

3. Only after an LEA has served all of its areas with a poverty rate above 75 percent may the LEA serve lower-ranked areas. The LEA has the option to (1) continue on with the district-wide ranking or (2) rank remaining areas by grade span groupings.

   - The same district-wide poverty average must be used if the LEA selects option (1).

   - For ranking by grade span groupings, the LEA may use (1) the district-wide poverty average or (2) the district-wide grade span poverty averages for the relevant grade span grouping.

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

   - 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.

4. 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.

LEA Discretion in Selecting Participating Areas and Schools

5. 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."

   - Use Part A funds in a school that does not serve an eligible school attendance area if the percentage of children from low-income families enrolled in the school is equal to or greater than the percentage of such children in a participating school attendance area of the LEA.

   - Elect not to serve an eligible school attendance area or school that has a higher percentage of children from low-income families (than a school that is served) if --

     - The school meets the Title I comparability requirements;

     - The school is receiving supplemental funds from other State or local sources that are spent according to the requirements of Sections 1114 or 1115; and

- The funds expended from such other sources equal or exceed the amount that would be provided under Title I, Part A.

- 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.

Allocating Title I Funds to Participating Areas and Schools

6. An LEA must allocate 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. An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to allocate funds to areas or schools in rank order.

7. If an LEA serves any areas or schools below 35 percent poverty, the LEA must allocate to all 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.

   - 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.

   - An LEA calculates 125 percent of its allocation per low-income child before the LEA reserves any funds.

   - An LEA must allocate at least this amount for each low-income child in every school the LEA serves, not just for those schools below 35 percent poverty.

   - If remaining funds are not sufficient to fully fund the next ranked eligible school attendance area or school, the LEA may serve the area or school if it determines the funds are sufficient to enable children to make adequate progress toward meeting the State's challenging performance standards.

8. An LEA serving only areas or schools at or above 35 percent poverty must allocate funds in rank order, on the basis of the total number of low-income children in each area or school but is not required to allocate 125 percent of the LEA's allocation per low-income child (described in 7. above). However, in determining what per-child amount to allocate, the LEA should bear in mind the purpose of such funding--to enable children who are most at risk of not meeting the State's challenging student academic achievement standards. The per-child allocation amount must be large

enough to provide a reasonable assurance that a school can operate a Title I program of sufficient quality to achieve that purpose.

9. 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.

10. An LEA that opts to serve schools below 75 percent poverty using grade span groupings may determine different per-child 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.

QUESTIONS AND ANSWERS

Q 1. If an LEA applies the "35 percent rule," must all school attendance areas with at least 35 percent poverty be served?

A. No. However, school attendance areas to be served must be selected in rank order.

Q 2. Section 1113(b)(1)(D)(ii) allows an LEA to skip an eligible school attendance area or school that has a higher percentage of poverty if the area or school is receiving supplemental funds from other State or local sources that are "spent according to the requirements of section 1114 or 1115." What is meant by "according to the requirements of section 1114 or 1115?"

A. Under §200.79 of the Title I regulations, a supplemental State or local program meets the requirements of Section 1114 if the program--

- Is implemented in a school that meets the minimum 40 percent poverty threshold required to operate a schoolwide program;

- Is designed to promote schoolwide reform and upgrade the entire educational operation of the school to support students in their achievement toward meeting the State's challenging academic achievement standards that all students are expected to meet;

- Is designed to meet the educational needs of all children in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the State's challenging student academic achievement standards; and

- Uses the State's assessment system described in §200.2 of the Title I regulations to review the effectiveness of the program.

A supplemental State or local program meets the requirements of Section 1115 if the program--

- Serves only children who are failing, or most at risk of failing, to meet the State's challenging student academic achievement standards;

- Provides supplementary services designed to meet the special educational needs of the children who are participating in the program to support their achievement toward meeting the State's student academic achievement standards; and

- Uses the State's assessment system described in §200.2 of the Title I regulations to review the effectiveness of the program.

Q 3. How does an LEA handle funds that are carried over from one year into the next when allocating funds to school attendance areas?

A. Although an LEA may not use carryover funds to provide services in an ineligible school, an LEA has considerable discretion in handling carryover funds. Some of these options include:

- Add carryover funds to the LEA's subsequent year's allocation and distribute them to participating areas and schools in accordance with allocation procedures that ensure equitable participation of non-pupil school children.

- Designate carryover funds for particular activities that could best benefit from additional funding. (Examples: parental involvement activities; schools with the highest concentrations of poverty.)

Regardless of the option an LEA elects, the LEA may not carry over more than 15 percent of its allocation from one year to the next. This percentage limitation does not apply, however, to an LEA that receives an allocation of less than $50,000 under subpart 2 of Part A. An SEA may, once every three years, waive the percentage limitation if it determines that the request of an LEA is reasonable and necessary or if supplemental appropriations become available.

Note that, if an LEA transfers funds from another Federal education program into Title I, Part A under the transferability provision in section 6123 of ESEA, then the additional amount transferred is added to the LEA’s Title I, Part A allocation and the combined amount becomes the base for calculating the 15 percent carryover limitation.

Q 4. 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?

A. The Title I statute requires allocations to be based on the total number of low-income children in a school attendance area or school. Therefore, poverty is the only factor on which an LEA may determine funding. In other words, an LEA may not allocate funds based on the instructional model, educational need, or any other non-poverty factor. Because Part A places the responsibility for selecting participants and designing programs on schools rather than on the LEA, the LEA will not necessarily be in a position to know in advance the instructional model or educational need when determining allocations.

Q 5. May an LEA reserve funds from its Part A allocation before distributing funds to school attendance areas?

A. Yes. Before allocating funds, an LEA must reserve funds to--

- Provide services comparable to those provided to children in participating school attendance areas and schools to serve--
  - Children in local institutions for neglected children; and
  - Eligible homeless children who do not attend participating schools, including providing educationally related support services to children in shelters and other locations where homeless children may live.
- Provide, if appropriate, services to--
  - Children in local institutions for delinquent children.
  - Neglected and delinquent children in community day school programs.
- Provide, where appropriate under section 1113(c)(4) of the Title I statute, not more than 5 percent of its Part A allocation for financial incentives and rewards to teachers who serve students in Title I schools identified for school improvement, corrective action, and restructuring, for the purpose of attracting and retaining qualified and effective teachers.
- Meet the requirements for choice-related transportation and supplemental educational services in section 1116(b)(10) and 1116(e)(6) of the Title I statute and §200.48 of the Title I regulations unless the LEA meets these requirements with non-Title I funds. The statute and regulations require that, unless a lesser amount is needed, an LEA spend an amount equal to 20 percent of its Title I, Part A allocation for this purpose. Of this amount, 5

percent must support choice-related transportation, 5 percent must support providing supplemental educational services, and the remaining 10 percent may support the costs of providing either choice-related transportation or supplemental educational services.

- Meet the professional development requirements of—

  - Section 1116(c)(7)(A)(iii) of the Title I statute and §200.52(a)(3)(iii) of the Title I regulations if the LEA has been identified for improvement. An LEA must reserve at least 10 percent of its Title I, Part A allocation for this purpose; and

  - Section 1119(l) of the Title I statute and §200.60 of the Title I regulations to meet the needs of teachers who are not highly qualified. An LEA must reserve an amount for this purpose that ranges from at least 5 to no more than 10 percent of its Title I, Part A allocation for school years 2002-03 and 2003-04 and at least 5 percent in subsequent years.

- Meet the requirements for parent involvement. An LEA that receives more than $500,000 under Title I, Part A, subpart 2 must reserve at least 1 percent of its allocation for parental involvement activities. The LEA must distribute not less than 95 percent of the amount reserved for parent involvement to schools receiving Title I services.

- Administer Part A programs for public and private school children, including special capital expenses, if any, incurred in providing services to eligible private school children such as—

  - The purchase and lease of real and personal property (including mobile educational units and neutral sites);

  - Insurance and maintenance costs;

  - Transportation; and

  - Other comparable goods and services, including non-instructional computer technicians.

- Conduct other authorized activities, such as preschool programs, summer school and intersession programs, additional professional development, school improvement, and coordinated services.

Because the reservation of funds by an LEA will reduce the funds available for distribution to participating areas and schools, the LEA must consult with teachers, pupil services personnel (where appropriate), principals, and parents of children in participating schools in determining, as part of its LEA plan, what

reservations are needed. This issue must also be part of the consultation with private school officials before an LEA makes any decisions that affect the opportunities of eligible private school children to participate in Part A programs.

An LEA must also ensure that it provides equitable services to private school children from Title I funds reserved "off the top" for district-wide instructional programs. See question 12 in this guidance for more discussion.)

Q 6. Is there a maximum amount that an LEA may reserve?

A. 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.

Q 7. How do funds that an LEA transfers into Part A of Title I under the transferability provision in section 6123 of ESEA affect the specific percentages an LEA must reserve for choice-related transportation and supplemental educational services, professional development, and parent involvement?

A. If an LEA transfers funds from another Federal education program into Title I, Part A under the transferability provision in section 6123, then the additional amount transferred is added to the LEA's Title I, Part A allocation, and the combined amount becomes the base for calculating the specific reserves required for choice-related transportation and supplemental educational services, professional development, and parent involvement.

Q 8. May an LEA consider variations in personnel costs, such as seniority pay differentials or fringe benefit differentials, as LEA-wide administrative costs, rather than as part of the funds allocated to school attendance areas?

A. Yes, this is an allowable option for the LEA. The statute requires that Part A funds be allocated to school attendance areas and schools on the basis of the number of children from low-income families in each area or school. This provision assumes, for example, that two schools with the same number of poor children need similar amounts of funds to provide comparable educational programs to participating children. An inequity may occur, however, if schools with similar allocations offering similar instructional programs need to spend different amounts because of the salary and fringe benefit costs of the staff providing the instruction. To address this situation, an LEA may consider variations in personnel costs, such as seniority pay differentials or fringe benefit differentials, as LEA-wide administrative costs, rather than as part of the funds allocated to school attendance areas or schools. The LEA would pay the differential salary and fringe benefit costs from its administrative funds taken off the top of the LEA's allocation. This policy would have to be applied consistently to staff serving both public and private school children throughout the LEA.

Q 9. How may preschool children be served under Part A?

A. There are several ways in which preschool children may be served under Part A. For example--

- A participating school may use part of its Part A funds to operate a preschool program.

- An LEA may reserve an amount from the LEA's total allocation to operate a Part A preschool program for eligible children in the district as a whole or for a portion of the district.

Q 10. Is there any flexibility in how an LEA may count children from low-income families in middle and high schools?

A. Of the four measures of poverty the statute permits an LEA to use for identifying eligible school attendance areas and allocating funds to those areas, eligibility for free or reduced-price lunch is by far the measure most frequently used. Yet, we know from experience that high school and middle school students are less likely to participate in free and reduced-price lunch programs than are elementary school students. Hence, those schools often may not be identified as eligible for Title I services or, if eligible, may not receive as high an allocation as their actual poverty rate would require. In order to address the situation, an LEA may use comparable data collected through alternative means such as a survey. Also, an LEA may use the "feeder pattern" concept. This concept allows the LEA to project the number of low-income children in a middle school or high school based on the average poverty rate of the elementary school attendance areas that feed into that school.

EXAMPLE OF FEEDER PATTERN

DISTRICT	**ENROLLMENT**	**LOW-INCOME #**
(Elementary)		
School A	568	364
School B	329	163
School C	588	262
School D	836	277
Total	2,321	1,066
(High School)	2,000	918 (Estimated)

Calculate average percentage of poverty for the four elementary school attendance areas by dividing the total number of low-income children by the total enrollment (1,066 ÷ 2,321). The average percentage of poverty is 45.92%.

Because these four elementary schools feed into the high school, the poverty percentage of the high school is projected to be 45.92%.

To calculate the number of low-income students in the high school, multiply the total school enrollment by the average percentage of poverty for the four elementary feeder schools (2,000 x 45.92%). **This is the number used for allocating Title I funds to the high school.**

EXAMPLE OF FEEDER PATTERN

DISTRICT	ENROLLMENT	LOW-INCOME #
(Elementary)		
School A (1)	512	360
School B (1)	322	142
School C (2)	450	100
School D (1)	376	201
School E (2)	504	221
School F (2)	610	307
School G (1)	416	202
Total	3,190	1,533
(Middle School 1)	1,599	890

Calculate average percentage of poverty for elementary attendance areas A, B, D, and G by dividing the total number of low-income children in schools A, B, D, and G by the total enrollment of schools A, B, D, and G (905 ÷ 1,626). The average percentage of poverty is 55.66%.

Because these four elementary schools feed into Middle School 1, the poverty percentage of Middle School 1 is projected as 55.66%

To calculate the number of low-income students in Middle School 1, multiply the total school enrollment by the average percentage of poverty for the four elementary feeder schools (1,599 x 55.66%). **This is the number used for allocating Title I funds to Middle School 1.**

(Middle School 2)	1,325	532

Calculate average percentage of poverty for elementary attendance areas C, E, and F by dividing the total number of low-income children in schools C, E, and F by the total enrollment of schools C, E, and F (628 ÷ 1,564). The average percentage of poverty is 40.15%.

Because these three elementary schools feed into Middle School 2, the poverty percentage of Middle School 2 is projected as 40.15%.

To calculate the number of low-income students in Middle School 2, multiply the total school enrollment by the average percentage of poverty for the three elementary feeder schools (1,325 x 40.15%). **This is the number used for allocating Title I funds to Middle School 2.**

Feeder Pattern Example (continued)

	ENROLLMENT	LOW-INCOME #
(High School)	3,000	1,422

Calculate average percentage of poverty for all elementary attendance areas by dividing the total number of low-income children by the total enrollment (1,533 ÷ 3,190). The average percentage of poverty is projected as 48.06%.

Because all elementary schools eventually feed into the high school, the poverty percentage of the high school is also 48.06%.

To calculate the number of low-income students in the high school, multiply the total school enrollment by the average percentage of poverty for all the elementary feeder schools (3,000 x 48.06%). **This is the number used for allocating Title I funds to the high school.**

When an LEA elects to use the feeder pattern, the LEA--

- Determines the district-wide average of poverty based on all of the schools for which the district is using actual poverty data; and

- Uses this district-wide average to rank all of the attendance areas or schools in the district.

If an LEA serves attendance areas or schools below a 35 percent 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.

Q 11. How are funds made available to provide services to eligible private school children?

A. Title I continues the requirement that an LEA provide equitable services to eligible children enrolled in private schools. Section 1113(c) of Title I requires an LEA to allocate funds to a participating 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 LEA, in consultation with 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 official cooperate in this effort. An LEA may count private school children from low-income families every year or every two years.

In collecting poverty data on private school children, the Title I statute gives an LEA flexibility to calculate the number of children who are from low-income families and attend private school. To obtain a count of private school children, an LEA may use:

1. The same poverty data it uses to count public school children.

2. Comparable poverty data from a survey of families of private school students that, to the extent possible, protects the families' identity. The LEA may extrapolate data from the survey based on a representative sample if complete actual data are not available.

3. Comparable data from a different source, such as scholarship applications so long as the income level for both sources is generally the same.

4. Proportional data based on the poverty percentage of each public school attendance area applied to the total number of private school children who reside in that area.

5. An equated measure of low income correlated with a measure of low income used to count public school children.

Although funds are allocated based on the number of poor children, private school children eligible to be served are children who reside in a participating public school attendance area and who are failing, or most at risk of failing, to meet student academic achievement standards based on the criteria in section 1115(b) of the Title I statute . To provide equitable services to eligible private school children, an LEA must reserve the amounts generated by poor private school children who reside in participating public school attendance areas. In consultation with private school officials, an LEA may choose one, or a combination, of the following options for using the funds reserved for private school children:

- Provide equitable services to eligible children in each private school with the funds generated by children from low-income families who reside in participating public school attendance areas and who attend that private school.

- Combine the funds generated by poor private school children in all participating areas to create a pool of funds from which the LEA provides equitable services to eligible private school children who reside in participating public school attendance areas and are in the greatest educational need of those services. Under this option, the services provided to eligible children in a particular private school are not dependent upon the amount of funds generated by poor children in the school.

Q 12. Must an LEA ensure that equitable services to private school children are provided from Title I funds reserved "off the top" for district-wide instructional programs?

A. Yes. If an LEA reserves Title I funds "off the top" for district-wide instructional programs, the equitable services requirement applies. Section 200.64(a)(2)(i)(A) of the Title I regulations requires that, if an LEA reserves funds for instructional activities for public elementary or secondary school students at the district level, the LEA must provide equitable services to eligible private school children. The LEA bases equitable services from the reserved funds on the proportion of private school children from low-income families residing in participating public school attendance areas.

Q 13. How does an LEA determine the amount of funds to be used for parent involvement activities for parents of participating private school students?

A. Section 1118 of the Title I statute requires an LEA to reserve funds off the top of its Title I allocation to carry out required Title I parental involvement activities. Section 200.65 of the Title I regulations requires the LEA to calculate the amount of funds available for parental involvement activities from the reserved funds based on the proportion of private school children from low-income families residing in participating public school attendance areas.

Q 14. How does an LEA determine the amount of funds to be used for professional development activities for teachers of private school Title I participants?

A. If an LEA reserves funds under section 1119 off the top of its Title I allocation for carrying out Title I professional development activities, the LEA must provide equitable services to teachers of private school participants from this set-aside. As required under §200.65 of the regulations, an LEA calculates these equitable services from the reserved funds in the proportion to the number of private school children from low-income families residing in participating public school attendance areas. Activities for the teachers of private school participants must be planned and implemented with meaningful consultation with private school officials and teachers.

Example 1 Note: Totals may not add due to rounding.

Per-Pupil 125% Calculation: To determine the amount per child, divide the LEA's allocation ($3,895,000) by its total number of children from low-income families (4,310) to arrive a poverty child ($903.71). Multiply this amount by 1.25 to determine the minimum per-child payment ($1,129.64) for each attendance area (see table below).

LEA Allocation		Count of Children from Low-Income Families		$ Per Poverty Child			
$3,895,000	Divided By	4,310	=	$903.71	X	125%	=

Total Title I Allocation for LEA		$3,895,000
Reservations:		
Neglected	-	$10,000
Homeless	-	$10,000
20% choice-related transportation & supplemental services	-	$779,000
10 % professional development for LEAs needing improvement	-	$389,500
5 % professional develoment for teachers not highly qualified	-	$194,750
1% parent involvement	-	$38,950
Administration	-	$334,970
Remaining amount to be distributed to schools		$2,137,830

ALLOCATION TO ELIGIBLE SCHOOLS

	Attendance Area	Total Enrollment	Childern from Low-Income Families: Public	Private	Total	Percent Poor	Eligible Schools 1 = Yes 0 = No	Minimum Attendance Area Allocation (No. Poor X $1,129.64) (1)	Attendance Area Allocation (1)
	LEA Total	23,144	4,196	114	4,310	LEA AVG. 18.62%	6	$2,137,830	$2,137,830
clipper	Valley View	1,187	436	13	449	37.83%	1	$507,208	$507,208
method	Violet Hill	1,486	472	9	481	32.37%	1	$543,357	$543,357
basket	Elemwood	1,625	428	25	453	27.88%	1	$511,727	$511,727
Wood	Oakdale	470	128	0	128	27.23%	1	$144,594	$144,594
smart	Hobson	1,026	204	10	214	20.86%	1	$241,743	$241,743
low	Davis	1,938	374	5	379	19.56%	1	$189,201	$189,201
tonnage	Takoma	1,843	331	8	339	18.39%	0		
pelican	Berlieth	1,594	290	0	290	18.19%	0		
shell	Indian Rock	2,891	484	16	500	17.30%	0		
sandy	Camp Springs	1,754	293	7	300	17.10%	0		
sea	Taft	3,539	390	15	405	11.44%	0		
lake	Bannaker	1,494	146	4	150	10.04%	0		
ocean	White Hill	1,464	143	2	145	9.90%	0		
wild	Eastern	833	77	0	77	9.24%	0		
wave	Roosevelt	0	0	0	0	0.00%	0		
gull	Wilson	0	0	0	0	0.00%	0		

(1) In this example there were only enough funds available to give the first five schools their full allocation based on the minimum amount per poor child of $1,129.64. Because th remaining, the next ranked eligible school (Davis) received that amount even though the amount received per poor child was less than $1,129.64. Alternatively, the LEA could h the remaining $189,201 proportionately among its first five eligible schools.

(2) The LEA must reserve the amount of funds generated by private school children and in consultation with appropriate private school officials may (1) combine those amounts to of funds from which the LEA provides equitable services to eligible private school children in greatest need of those services; or (2) provide equitable services to eligible childre private school with the funds generated by children from low-income families who attend that private school.

EXAMPLE OF RANKING SCHOOLS & ALLOCATING FUNDS IN AN LEA USING THE 35% ELIGIBILITY PROVISION

Example 2

Note: Totals may not add due to rounding.

Per-Pupil Calculation (125% Not Required)

Amount LEA determines to allocate per-poverty child (LEA Discretion)	$700.00

Total Title I Allocation for LEA		$7,169,132
Reservations		
Neglected	-	$38,000
Homeless	-	$20,000
20% choice-related transportation & supplemental services	-	$1,433,826
10 % professional development for LEAs needing improvement	-	$716,913
5 % professional develoment for teachers not highly qualified	-	$358,457
1% parent involvement	-	$71,691
Administration	-	$616,545
Remaining amount to be distributed to schools		$3,913,700

ALLOCATION TO ELIGIBLE SCHOOLS

Attendance Area	Total Enrollment	Children from Low-Income Families: Public	Private	Total	Percent Poor	Eligible Schools 1 = Yes 0 = No	Attendance Area Allocation (No. of Poor X $700)	Allocation Generated By Public School Poor Children	Allocation Generated By Private School Poor Children (1)
					LEA AVG.				
LEA Total	14,059	6,767	100	6,867	48.84%	11	$3,913,700	$3,847,200	$66,500
Violet Hill	870	850	20	870	100.00%	1	$609,000	$595,000	$14,000
Oakdale	276	202	8	210	76.09%	1	$147,000	$141,400	$5,600
Elemwood	951	591	24	615	64.67%	1	$430,500	$413,700	$16,800
Valley View	696	444	0	444	63.79%	1	$310,800	$310,800	$0
Hobson	601	367	10	377	62.73%	1	$263,900	$256,900	$7,000
Berlieth	933	550	5	555	59.49%	1	$388,500	$385,000	$3,500
Davis	1,134	646	8	654	57.67%	1	$457,800	$452,200	$5,600
Indian Rock	1,695	815	0	815	48.08%	1	$570,500	$570,500	$0
Roosevelt	203	95	0	95	46.80%	1	$66,500	$66,500	$0
Takoma	1,080	487	6	493	45.65%	1	$345,100	$340,900	$4,200
Camp Springs	1,026	449	14	463	45.13%	1	$324,100	$314,300	$9,800
White Hill	857	293	3	296	34.54%	0			
Bannaker	874	299	2	301	34.44%	0			
Eastern	490	142	0	142	28.98%	0			
Taft	2,073	509	0	509	24.55%	0			
Wilson	300	28	0	28	9.33%	0			

(1) The LEA must reserve the amount of funds generated by private school children and in consultation with appropriate private school officials may (1) combine those amounts to create a pool of funds from which the LEA provides equitable services to eligible private school children in greatest need of those services; or (2) provide equitable services to eligible children in each private school with the funds generated by children from low-income families who attend that private school.

EXAMPLE OF RANKING SCHOOLS & ALLOCATING FUNDS IN AN LEA SERVING ATTENDANCE AREAS ABOVE THE DISTRICT POVERTY RATE

Example 3

Note: Totals may not add due to rounding.

Per-Pupil Calculation (125% Not Required)

Amount LEA determines to allocate per-poverty child (LEA Discretion)	$1,050.66

Total Title I Allocation for LEA		$7,169,132
Reservations		
Neglected	-	$38,000
Homeless	-	$20,000
20% choice-related transportation & supplemental services	-	$1,433,826
10 % professional development for LEAs needing improvement	-	$716,913
5 % professional develoment for teachers not highly qualified	-	$358,457
1% parent involvement	-	$71,691
Administration	-	$616,545
Remaining amount to be distributed to schools		$3,913,700

ALLOCATION TO ELIGIBLE SCHOOLS

Attendance Area	Total Enrollment	Children from Low-Income Families: Public	Children from Low-Income Families: Private	Children from Low-Income Families: Total	Percent Poor	Eligible Schools Receiving Funds 1 = Yes 0 = No	Attendance Area Allocation (No. of Poor X $1,050.66)	Allocation Generated By Public School Poor Children	Allocation Generated By Private School Poor Children (2)
LEA Total	14,059	6,767	100	6,867	LEA AVG. 48.84%	7	$3,913,700	$3,834,900	$78,799
Violet Hill	870	850	20	870	100.00%	1	$914,074	$893,061	$21,013
Oakdale	276	202	8	210	76.09%	1	$220,639	$212,233	$8,405
Elemwood	951	591	24	615	64.67%	1	$646,156	$620,940	$25,216
Valley View	696	444	0	444	63.79%	1	$466,493	$466,493	$0
Hobson	601	367	10	377	62.73%	1	$396,099	$385,592	$10,507
Berlieth	933	550	5	555	59.49%	1	$583,116	$577,863	$5,253
Davis	1,134	646	8	654	57.67%	1	$687,123	$678,718	$8,405
Indian Rock	1,695	815	0	815	48.08%	0	$0		
Roosevelt	203	95	0	95	46.80%	0	$0		
Takoma	1,080	487	6	493	45.65%	0	$0		
Camp Springs	1,026	449	14	463	45.13%	0	$0		
White Hill	857	293	3	296	34.54%	0	$0		
Bannaker	874	299	2	301	34.44%	0	$0		
Eastern	490	142	0	142	28.98%	0	$0		
Taft	2,073	509	0	509	24.55%	0	$0		
Wilson	300	28	0	28	9.33%	0	$0		

(1) The LEA must reserve the amount of funds generated by private school children and in consultation with appropriate private school officials may (1) combine those amounts to create a pool of funds from which the LEA provides equitable services to eligible private school children in greatest need of those services; or (2) provide equitable services to eligible children in each private school with the funds generated by children from low-income families who attend that private school.

EXAMPLE OF RANKING SCHOOLS & ALLOCATING FUNDS IN AN LEA

USING THE 35% ELIGIBILITY PROVISION AND ALLOWING FOR "BANDS" OF POVERTY WITHIN THE LEA

Example 4

Note: Totals may not add due to rounding.

Per-Pupil Calculation (125% Not Required)

Amount LEA determines to allocate per-poverty child:	
Schools with greater than 65% poverty	$749
Schools with greater than 50% poverty, less than 65% poverty	$701
Schools with less than 50% poverty (LEA Discretion)	$670

Total Title I Allocation for LEA		$7,169,132
Reservations		
Neglected	-	$38,000
Homeless	-	$20,000
20% choice-related transportation & supplemental services	-	$1,433,826
10 % professional development for LEAs needing improvement	-	$716,913
5 % professional develoment for teachers not highly qualified	-	$358,457
1% parent involvement	-	$71,691
Administration	-	$616,960
Remaining amount to be distributed to schools		$3,913,285

ALLOCATION TO ELIGIBLE SCHOOLS

Attendance Area	Total Enrollment	Children from Low-Income Families: Public	Private	Total	Percent Poor	Eligible Schools 1 = Yes 0 = No	Attendance Area Allocation (No. Poor X $749, $701, or $670, Depending on Poverty Band)	Allocation Generated By Public School Poor Children	Allocation Generated By Private School Poor Children (1)
LEA Total	14,059	6,767	100	6,867	LEA AVG. 48.84%	11	$3,913,285	$3,845,966	$67,319
Violet Hill	870	850	20	870	100.00%	1	$651,630	$636,650	$14,980
Oakdale	276	202	8	210	76.09%	1	$157,290	$151,298	$5,992
Elemwood	951	591	24	615	64.67%	1	$431,115	$414,291	$16,824
Valley View	696	444	0	444	63.79%	1	$311,244	$311,244	$0
Hobson	601	367	10	377	62.73%	1	$264,277	$257,267	$7,010
Berlieth	933	550	5	555	59.49%	1	$389,055	$385,550	$3,505
Davis	1,134	646	8	654	57.67%	1	$458,454	$452,846	$5,608
Indian Rock	1,695	815	0	815	48.08%	1	$546,050	$546,050	$0
Roosevelt	203	95	0	95	46.80%	1	$63,650	$63,650	$0
Takoma	1,080	487	6	493	45.65%	1	$330,310	$326,290	$4,020
Camp Springs	1,026	449	14	463	45.13%	1	$310,210	$300,830	$9,380
White Hill	857	293	3	296	34.54%	0			
Bannaker	874	299	2	301	34.44%	0			
Eastern	490	142	0	142	28.98%	0			
Taft	2,073	509	0	509	24.55%	0			
Wilson	300	28	0	28	9.33%	0			

(1) The LEA must reserve the amount of funds generated by private school children and in consultation with appropriate private school officials may (1) combine those amounts to create a pool of funds from which the LEA provides equitable services to eligible private school children in greatest need of those services; or (2) provide equitable services to eligible children in each private school with the funds generated by children from low-income families who attend that private school.