Title I Coordinators:

The Department of Education issued today the attached technical assistance paper regarding Providing Services to Eligible Private School Children. As a result of the federal Title I, Part A monitoring that took place in October 2011, our office is providing additional technical assistance to Florida's local educational agencies (LEAs) regarding Title I programs in participating private schools. One of the ways we will be providing this additional technical assistance is by communicating bi-monthly via email regarding the Title I requirements for private schools. This month's topic is to calculate equitable services (e.g. free and reduced-price (FRPL), Extrapolation, Proportionality) and how an LEA can use different calculations based on consultation.

Section 1120(c)(1) of the Title I statute and 34 CFR, Part 200, Section 200.78(2) allows an LEA to calculate the number of children who are from low-income families and attend private schools in several ways:

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

   a. *In order to obtain the number of private school children from low-income families, an LEA may use a survey to obtain poverty data comparable to those used for public school students. To the extent possible, the survey must protect the identity of families of private school students.* The only information necessary for an LEA to collect in such a survey of private school children is:
      (1) geographic information verifying residence in a participating public school attendance area;
      (2) grade level of each child; and
      (3) income level of parents.

   Under Section 1002.42 of the Florida Statutes, LEAs may not require that the private school officials give the names of low-income families.

   b. *After obtaining income data from a representative sample of families with children in private schools, an LEA may extrapolate* the *data to the entire private school student population if complete actual data are unavailable. The LEA should take care to ensure that the data are truly representative of the private school students in the LEA.*

EXAMPLE OF REPRESENTATIVE SAMPLE AND EXTRAPOLATION:

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

Key:
Column 1. Public school attendance area
Column 2. Number (#) of resident private school children
Column 3. Number (#) of private school children submitting surveys
Column 4. Number (#) of low-income private school children on returned surveys
Column 5. Extrapolated number (#) of low-income private school children

CALCULATIONS:

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

Col. 4 (# of low-income on survey) multiplied by Col. 2 (# resident private school children)
Col. 3 (total submitted surveys)

Or $\quad \dfrac{100}{115}$ times 150 = 130 $\qquad \dfrac{4}{10}$ times 20 = 8

3. <u>Using comparable poverty data from a different source.</u> *If data from the same source used for public school children are not available, an LEA may use poverty data for private school children that are from a different source than the data it uses for public school children as long as the income threshold in both sources is generally the same.*

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

4. <u>Using proportionality</u>. An LEA may apply the low-income percentage of each participating public school attendance area or school to the number of private school children who reside in that school attendance area. To do this, an LEA will need the

addresses and grade levels of those students attending private schools. Under Florida Statute 1002.42, an LEA cannot require that a private school provide this information. However, private schools may provide the information on a voluntary basis.

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

EXAMPLE OF PROPORTIONALITY CALCULATIONS:

Using an equated measure. *An LEA may use an equated measure of low-income status by correlating sources of data—that is, determining the proportional relationship between two sources of data on public school children and applying that ratio to a known source of data on private school children.* An LEA uses free and reduced-price lunch data, but the data are not available for private school students. However, if TANF data are available, the LEA could determine an equated measure of poor students in private schools based on free and reduced-price lunch data by correlating the two sets of data as follows: TANF in the public school is to free and reduced price lunch as TANF in private schools is to "X."

$$\frac{\text{TANF (public)}}{\text{Free \& reduced price lunch (public)}} = \frac{\text{TANF (private)}}{\text{X (private)}}$$

In this example, the LEA may then use the equated number of private school students based on free and reduced-price lunch data ("X") as the number of low-income private school students.

We hope that you have found this information helpful. Please look for the next bi-monthly communication coming in June 2012 and stay tuned to hear about other ways we will be providing additional assistance related to Title I private school programs.

If you have any questions about the Title I private school program, please contact Audrey.Obinyan@fldoe.org.