Title I Building Eligibilty

A Determination of Title I Building Eligibilty and Rank Order

INTRODUCTION

Title I Part A of the Elementary and Secondary Education Act of 1965 as amended by Every Student Succeeds Acts requires LEAs ***to identify and expend funds based on building low-income numbers and district selected rank order methodology.*** ESEA provides multiple methods an LEAs can use to determine building eligibility for Title I Services. This document will review each method and the criteria for identification and rank ordering within each methodology provided.

Any LEA with an enrollment of 1,000 students or more must first set aside funds for specific districtwide Title I eligible activities. Once completed must then identify and rank order their schools for Title I eligibility and allocate Title I funds to those schools according to the percentage of low-income students.

Required District Set-Asides

An LEA is required to set aside funds prior to allocating to buildings the following:

1. Non-Public Equitable Service amounts for eligible low-income students within the LEAs service area that attend eligible Non-Public schools.
2. For an LEA that receives more than $500,000.00 in its original Title I allocations, 1% of the total allocation must be reserved for Parent and Family Engagement Activities.
3. LEAs are required to reserve funds for homeless children and unaccompanied youth for Title I services in non-Title I schools that are comparable to the Title I

DETERMINING ELIGIBILITY

Under section 1113(a)(5)(A) of the ESEA, an LEA must use the same measure of poverty to:

- ➢ Identify eligible school attendance areas and schools;
- ➢ Rank areas and schools; and
- ➢ Determine the allocation for each area and school based on the established rank order and number of poverty students in each school.

The same measure of poverty must be taken from the same period of time for all buildings in the district when determining eligibility. The building eligibility page in the CCIP pulls data from October attendance data from the prior year. When a district makes changes to the data collected through the state Educational Management and Integration System (EMIS), district must upload the supporting documentation for the changes made. Supporting documents must be official district reports for ADA and poverty.

Determining Poverty Counts of Public Schools and Ranking Schools Section 1113(a)(3) of the ESEA and 34 C.F.R. 200.78(a)(1) require an LEA to rank all of its school attendance areas according to their percentage of public-school students from low-income families. ESEA section 1113(b)(1)(B) also permits an LEA to rank its schools according to their percentage of public-school students from low-income families enrolled in the schools. To achieve this LEAs must use the most recently available poverty data. To determine school poverty an LEA has several options allowable under ESEA section 1113(a)(5)(A). An LEA may use the number of students:

1. Eligible under the LEAs free or reduced lunch count*, including children counted through the Community Eligibility Provision.
2. Eligible under direct certified programs for families receiving services:
    a. Title IV, Part A of the Social Security Act (Temporary Assistance for Needy Families).
    b. Medicaid Programs
3. District census data for children ages 5-17 living in poverty from the LEA service area on the most recent census data.
4. A composite score using any of the above measures.

DETERMINING POVERTY USING A COMPOSITE SCORE

The composite score can be helpful for districts that have multiple buildings with the same poverty percentages, such as in CEP reimbursement or above 75% poverty percentage. Because census data are generally, not available at the school level, if an LEA uses census measure, it would most likely be part of a composite with one or more of the above measures. There are several steps a district will need take to determine building composite scores.

1. Gather the data: The district will need buildings enrollment data, poverty measures under FRPL or CEP program for each building and district census poverty level for children ages 5-17. *To obtain the census poverty level for Title I purposes, contact your federal programs consultant in the Office of Ohio Department of Education.*
2. Calculate each buildings' composite score using the following formula:
    a. Determine number of low-income students using FRPL or CEP percentages
    b. Determine number of low-income students using district Title I census data.
    c. Determine average number of low-income students between both measures.
    d. Determine composite percentage by dividing building avg. low-income enrollment by building enrollment.

* An LEA with an enrollment of fewer than 1,000 students does not have to follow the requirements of section 1113 of the ESEA and 34 C.F.R. 200.78 to determine which of its schools receive Title I funds. (ESEA section 1113(a)(6)). Such an LEA may use other criteria, such as academic performance or the grade span of its schools to determine which of its schools receive Title I funds, or it may choose to allocate Title I funds to all of its school.

Example: District Census Data: 22.16%

Building A: Enrollment: 348 FRPL: 58%
Building B: Enrollment: 659 FRPL: 84%

District	Enrollment x FRPL percentage	Enrollment x Census Poverty	Add Both Poverty Numbers	Divide Total by 2 for Average Low-Income	Divide Avg. Low-Income by Bldg. Enrollment for Composite
Building A	348 x .58 = 201.84	348 x .2216 = 77.12	201.84 + 77.12 = 278.96	278.96 / 2 = 139.48	139.48 / 348 = .40
Building B	659 x .84 = 553.56	658 x .2216 = 146.03	553.56 x 146.03 = 699.59	699.99 / 2 = 350	350 / 659 = .53

ADDITIONAL FLEXIBILITIES

Additional flexibilities exist for determining eligibility for districts to use when identifying buildings for Title I services in the district. These flexibilities do not require application to all buildings in the district and may be utilized to assist with eligibility for district selected buildings. A district may determine eligibility for some buildings by:

- Using a feeder pattern for district secondary schools.
- Using rounding for building poverty level.
- Using previously served for building's that were eligible for Title I services in the prior year.

CALCULATING FEEDER PATTERN IN SECONDARY SCHOOLS

The feeder pattern option is available for determining eligibility of secondary schools for Title I services. ESEA defines elementary and secondary schools as:

An "elementary school" means a "nonprofit institutional day or residential school, including a public elementary charter school, that provides elementary education, as determined under State law." (ESEA section 8101(19)).

A "secondary school" means a "nonprofit institutional day or residential school, including a public secondary charter school, that provides secondary education, as determined under State law, except that the term does not include any education beyond grade 12." (ESEA section 8101(45)).

Ohio Defines secondary schools as :

> *A high school is one of higher grade than an elementary school, in which instruction and training are given in accordance with sections 3301.07 and 3313.60 of the Revised Code and which also offers other subjects of study more advanced than those taught in the elementary schools and such other subjects as may be approved by the state board of education.*
>
> *An elementary school is one in which instruction and training are given in accordance with sections 3301.07 and 3313.60 of the Revised Code and which offers such other subjects as may be approved by the state board of education. In districts wherein a junior high school is maintained, the elementary schools in that district may be considered to include only the work of the first six school years inclusive, plus the kindergarten year.* R.C. 3301.16.

Districts with buildings consisting of grades 6-8 as a may be able to use the feeder pattern if such school operates as a secondary school *in which instruction and training are given in accordance with sections 3301.07 and 3313.60 of the Revised Code and which also offers other subjects of study more advanced than those taught in the elementary schools and such other subjects as may be approved by the state board of education for two-thirds of the grades in the building.*

To determine the number of public-school students from low-income families in a secondary school, section 1113(a)(5)(B) of the ESEA and 34 C.F.R. 200.78(a)(2) provides an LEA the option to use one of the measures described above or a **feeder pattern** by applying the average percentage of public-school students from low-income families enrolled in the elementary schools that feed into the secondary school to the number of students enrolled in the secondary school. Before an LEA may use feeder patterns to determine the poverty percentage of its secondary schools, the LEA must conduct outreach to its secondary schools to inform them of the option and **a majority** of its secondary schools must approve the use of feeder patterns (ESEA section 1113(a)(5)(C)).

IRN	Building Name	Grade Span	Adjusted Enrollment	Low Income Students		Sort Order (Asc)	Eligibility For Service	Eligible By Other Factors	Prev. Served (Insert notes into log)	Feeder Pattern or Rounding % of Low Income	Recalculation # of Low Income	Service	School Label	Gap Closing
				Number	Percent									
		K-3	286	110	38.46 %	1	☑	☐	☐			SW-Exist	Independent	
		4-6	236	94	39.83 %	2	☑	☐	☐			SW-Exist	Independent	
		7-12	420	135	32.14 %	3	☑	☑	☐	39.15	164.43	SW-Exist	Independent	
			942	339	35.99 %									

** The above district used the feeder pattern to make its high school eligible for Title I service.*

To calculate feeder pattern:
1: Add the FRPL counts and enrollment counts of the LEA's elementary schools
K-6 enrollment 286+236 = 522 ***K-6 FRPL 110+94= 204***

2: Divide the FRPL sum by the enrollment sum to determine the poverty percentage for the high school
204 ÷ 522 = 39.08%

3. Multiply the quotient by the HS's enrollment to determine the number of poverty students in the high school:
39.1% (.391) x 420 = 164.22 poverty students

As a result of using the feeder pattern, the high school's poverty level is more than the district's overall poverty allowing it to remain eligible for SW Title I services.

PREVIOUSLY SERVED:

ESEA provides for buildings whose poverty level drops below the poverty percentage to continue to provide services one additional year only. Section 1113(b)(1)(C) of the ESEA authorizes an LEA to allocate Title I funds to a school that is no longer eligible but was eligible and served in the preceding year. This provision applies to a newly ineligible school and not to the ranking order of a building that has fallen in it's rank order due to a change in poverty level.

ROUNDING:

A district may round the poverty percentage to determine a building eligible for services. For example, a districtwide low income is 26.92% and the building low income is 26.63%. By nature of rounding, both numbers are 27%; therefore, the building is equal to the district average and eligible for Title I service.

RANK ORDERING AND DETERMINING ELIGIBILITY:

ESEA provides districts several options to determine rank ordering and eligibility for services in the district. It is often helpful to review several methods in a district prior to determining eligibility for services and allocating Title I funds to schools. Regardless of methodology any building that has a poverty level above 75% must be ranked above any buildings in the district with a poverty level below 75%. The methodology used must be consistent across the district. Each of the following methods will be described in this section.

- Sort by FRPL, CEP, or Composite score poverty level
- Sort by grade span options
  - Building's grade span average poverty
  - District grade span average poverty

*Free or reduced-priced lunch (FRPL) under the *Richard B. Russell National School Lunch Act*
**For FY22 ODE will export data from FY19 allowable under USDoE flexibilities.

RANK ORDERING BY POVERTY LEVEL:

A district may use building's FRPL percentage, CEP Identified students, CEP Reimbursement percentages, or a composite score to rank order and determine eligibility.

Rank Order by Free and Reduced Lunch Percentage: The system defaults to this sort for districts that use the free and reduced price lunch program.

Save and View All Buildings (opens new window)
There are **3** buildings. Displaying page: **1** of **1**
If any buildings are using the Community Eligibility Provision (CEP), check here: ☐

IRN	Building Name	Grade Span	Adjusted Enrollment	Low Income Students		Sort Order (Asc)	Eligibility For Service	Eligible By Other Factors	Prev. Served (Insert notes into log)	Feeder Pattern or Rounding % of Low Income	Recalculation # of Low Income	Service	School Label	Gap Closing
				Number	Percent									
		K-4	343	149	43.44 %		☑	☐	☐			SW-Exist	Independent	
		5-8	260	107	41.15 %		☑	☐	☐			SW-Exist	Watch, SWD	
		9-12	331	107	32.33 %		☐	☐	☐			None	Independent	
			934	363	38.87 %									

Rank Order by CEP Reimbursement: For districts that are CEP, the system will rank order by CEP Reimbursed percentage.

Save and View All Buildings (opens new window)
There are **4** buildings. Displaying page: **1** of **1**
If any buildings are using the Community Eligibility Provision (CEP), check here: ☑
If you decline to use the CEP Reimburse %, and only want to use CEP Identified Student %, check here: ☐

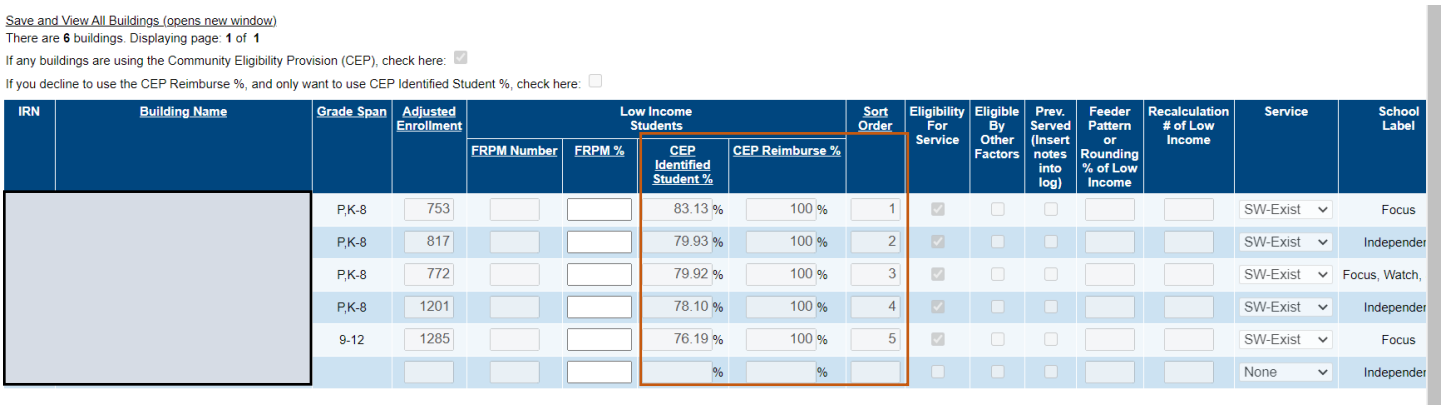
IRN	Building Name	Grade Span	Adjusted Enrollment	Low Income Students				Sort Order	Eligibility For Service	Eligible By Other Factors	Prev. Served (Insert notes into log)	Feeder Pattern or Rounding % of Low Income	Recalculation # of Low Income	Service	School Label
				FRPM Number	FRPM %	CEP Identified Student %	CEP Reimburse %								
		K-2	225			44.00 %	70.40 %		☑	☐	☐			SW-Exist	Independent
		3-5	176			36.36 %	58.18 %		☑	☐	☐			SW-Exist	Independent
		6-8	233			35.19 %	56.30 %		☑	☐	☐			SW-Exist	Independent
		9-12	254			32.28 %	51.65 %		☑	☐	☐			SW-Exist	Focus, Watch, SWD

Rank Order by CEP Identified: To rank order by CEP Identified, the district will need to check the box above the chart and then sort order the buildings according to their CEP identified percentage. Notice that the reimbursement column is no longer present.

Save and View All Buildings (opens new window)
There are **7** buildings. Displaying page: **1** of **1**
If any buildings are using the Community Eligibility Provision (CEP), check here: ☑
If you decline to use the CEP Reimburse %, and only want to use Direct Certified Student %, check here: ☐

IRN	Building Name	Grade Span	Adjusted Enrollment	CEP Identified Student %	Sort Order	Eligibility For Service	Eligible By Other Factors	Prev. Served (Insert notes into log)	Feeder Pattern or Rounding % of Low Income	Recalculation # of Low Income	Service	School Label	Gap Closing
		7-8	514	44.38 %	1	☑	☐	☐			SW-Exist	Watch, Gifted	
		9-12	915	35.83 %	2	☑	☐	☐			SW-Exist	Independent	
		3-6	853	47.80 %	3	☑	☐	☐			SW-Exist	Focus	
		1-2	455	52.63 %	4	☑	☐	☐			SW-Exist	Focus, Watch, SWD	
		K,P	339	54.18 %	5	☑	☐	☐			SW-Exist	Focus	
		K-6,P		%		☐	☐	☐			None	Focus	
		K-6		%		☐	☐	☐			None	Independent	

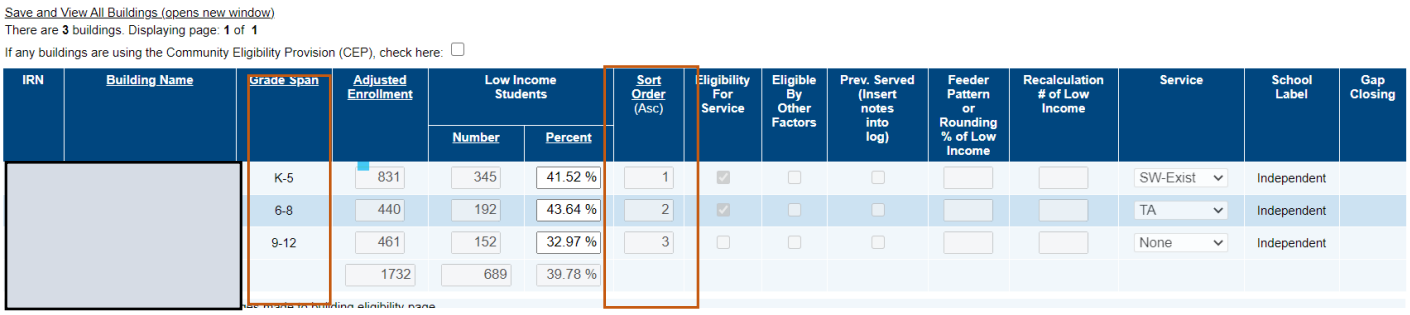
Rank Order When CEP Reimbursement Amounts are the Same: When the CEP reimbursement amounts are the same, a district will rank first by the reimbursement % and then by the CEP identified percentage as was done in this example below.



Save and View All Buildings (opens new window)
There are **6** buildings. Displaying page: **1** of **1**
If any buildings are using the Community Eligibility Provision (CEP), check here:
If you decline to use the CEP Reimburse %, and only want to use CEP Identified Student %, check here:

IRN	Building Name	Grade Span	Adjusted Enrollment	Low Income Students				Sort Order	Eligibility For Service	Eligible By Other Factors	Prev. Served (Insert notes into log)	Feeder Pattern or Rounding % of Low Income	Recalculation # of Low Income	Service	School Label
				FRPM Number	FRPM %	CEP Identified Student %	CEP Reimburse %								
		P,K-8	753			83.13 %	100 %	1	☑	☐	☐			SW-Exist	Focus
		P,K-8	817			79.93 %	100 %	2	☑	☐	☐			SW-Exist	Independer
		P,K-8	772			79.92 %	100 %	3	☑	☐	☐			SW-Exist	Focus, Watch,
		P,K-8	1201			78.10 %	100 %	4	☑	☐	☐			SW-Exist	Independer
		9-12	1285			76.19 %	100 %	5	☑	☐	☐			SW-Exist	Focus
						%	%		☐	☐	☐			None	Independer

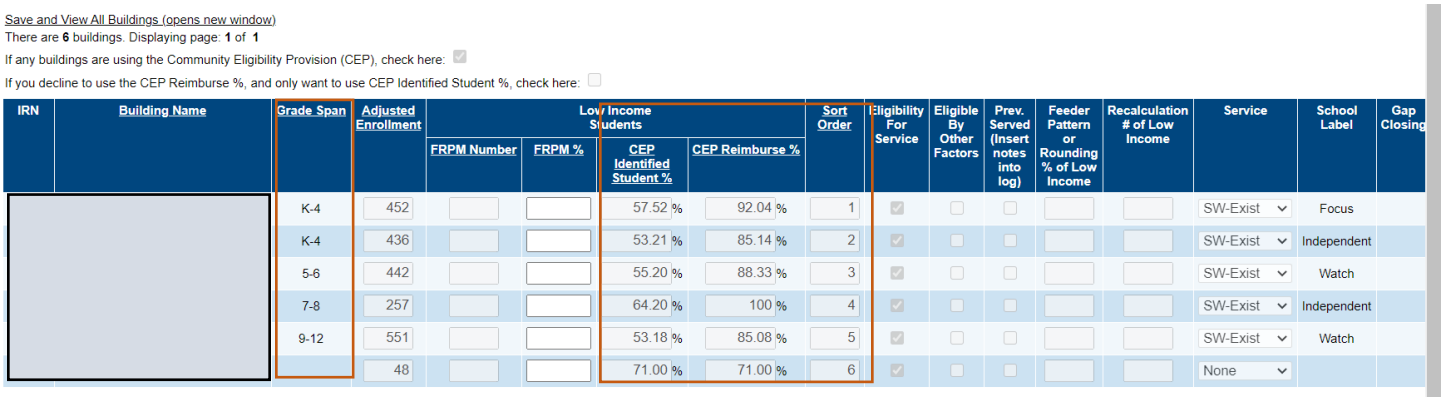
Rank Order by Grade Span: Rank ordering by grade spans allows districts to target their Title I services towards identified grade spans based on district and building needs. In the example below, this district decided to prioritize their elementary building first.



Save and View All Buildings (opens new window)
There are **3** buildings. Displaying page: **1** of **1**
If any buildings are using the Community Eligibility Provision (CEP), check here:

IRN	Building Name	Grade Span	Adjusted Enrollment	Low Income Students		Sort Order (Asc)	Eligibility For Service	Eligible By Other Factors	Prev. Served (Insert notes into log)	Feeder Pattern or Rounding % of Low Income	Recalculation # of Low Income	Service	School Label	Gap Closing
				Number	Percent									
		K-5	831	345	41.52 %	1	☑	☐	☐			SW-Exist	Independent	
		6-8	440	192	43.64 %	2	☑	☐	☐			TA	Independent	
		9-12	461	152	32.97 %	3	☐	☐	☐			None	Independent	
			1732	689	39.78 %									

Rank Order by CEP Identified and Grade Span Option: Another option is to rank order by grade span using the CEP identified number.



Save and View All Buildings (opens new window)
There are **6** buildings. Displaying page: **1** of **1**
If any buildings are using the Community Eligibility Provision (CEP), check here:
If you decline to use the CEP Reimburse %, and only want to use CEP Identified Student %, check here:

IRN	Building Name	Grade Span	Adjusted Enrollment	Low Income Students				Sort Order	Eligibility For Service	Eligible By Other Factors	Prev. Served (Insert notes into log)	Feeder Pattern or Rounding % of Low Income	Recalculation # of Low Income	Service	School Label	Gap Closing
				FRPM Number	FRPM %	CEP Identified Student %	CEP Reimburse %									
		K-4	452			57.52 %	92.04 %	1	☑	☐	☐			SW-Exist	Focus	
		K-4	436			53.21 %	85.14 %	2	☑	☐	☐			SW-Exist	Independent	
		5-6	442			55.20 %	88.33 %	3	☑	☐	☐			SW-Exist	Watch	
		7-8	257			64.20 %	100 %	4	☑	☐	☐			SW-Exist	Independent	
		9-12	551			53.18 %	85.08 %	5	☑	☐	☐			SW-Exist	Watch	
			48			71.00 %	71.00 %	6	☑	☐	☐			None		

Rank Order by Poverty with 75% poverty level rule.
Under section 1113(a)(4) of the ESEA and 34 C.F.R. 200.78(a)(3), after an LEA has served all of its schools with a poverty rate above 75 percent, if funds remain, the LEA may serve lower-ranked eligible schools. To determine eligibility among these schools, in addition to the district-wide ranking method illustrated above, an LEA may determine eligibility within grade spans and choose which grade span(s) to serve. In doing so, the LEA may use its district-wide percentage of poverty or the percentage of poverty data of the relevant grade span(s). (34 C.F.R. 200.78(a)(3)). If a grade-span poverty percentage is above 35 percent, the LEA may also identify as eligible any school with a poverty percentage of at least 35 percent. (ESEA section 1113(b)(1)(A)).

In the sample below all buildings in this district are eligible for Title I services based on the poverty level of the individual buildings. However, with the CEP option there are two different poverty levels the district could select to use. If the district elected to use the CEP reimbursement percentage, it would be required to serve buildings in sort order 1-7. The district could opt to not serve buildings 8-10, electing to focus the funds in the first seven buildings on the sort order page.

Another option for the building would have been to use the CEP identified percentage. In this case, the district would only be required to serve buildings 1-2. They could also grade span sort below the second building and elect to serve based on grade spans. Again, the district elects how it wants to determine which buildings Title I services would be available.

Finally, the district could determine to do a composite score for their buildings to determine eligibility and sort order their buildings. This sample is provided to highlight districts need to be aware of all options available so that they can best channel the funds to the buildings and or grade spans in the district that it believes need the greatest supports for improvement efforts.

IRN	Building Name	Grade Span	Adjusted Enrollment	Low Income Students: FRPM Number	FRPM %	CEP Identified Student %	CEP Reimburse %	Sort Order	Eligibility For Service	Eligible By Other Factors	Prev. Served (Insert notes into log)	Feeder Pattern or Rounding % of Low Income	Recalculation # of Low Income	Service	School Label	Gap Closing
		K-5,P	587			82.45 %	100 %	1	☑	☐	☐			SW-Exist	Focus, Watch	
		K-5,P	424			78.30 %	100 %	2	☑	☐	☐			SW-Exist	Focus	
		7-8	861			59.70 %	95.52 %	3	☑	☐	☐			SW-Exist	Focus, Watch	
		6	459			59.26 %	94.81 %	4	☑	☐	☐			SW-Exist	Focus, Watch, SWD	
		K-5,P	507			58.97 %	94.36 %	5	☑	☐	☐			SW-Exist	Independent	
		K-5	569			56.41 %	90.26 %	6	☑	☐	☐			SW-Exist	Independent	
		K-5	498			55.02 %	88.03 %	7	☑	☐	☐			SW-Exist	Focus	
		9-12	1515			46.07 %	73.72 %	8	☑	☐	☐			SW-Exist	Focus, Watch	
		K-6	349			45.85 %	73.35 %	9	☑	☐	☐			SW-Exist	Focus, Watch, Gifted	
		K-5	469			45.84 %	73.35 %	10	☑	☐	☐			SW-Exist	Watch, Gifted	

Total Enrollment:	6238
Total Low Income Number:	5415.84
Total District-wide Low Income Percent:	86.82 %

Rank Ordering by Grade Span Averaging: *NEW*
A new option that is available for districts is grade span averaging. Once districts have ranked any building that is 75% or higher in poverty, the district may sort order by grade span and determine service by building poverty level or grade span average poverty. The sample below highlights two buildings that would not be eligible by district average or 35% or higher poverty requirement. However, the buildings are eligible by their grade span average. In one case the

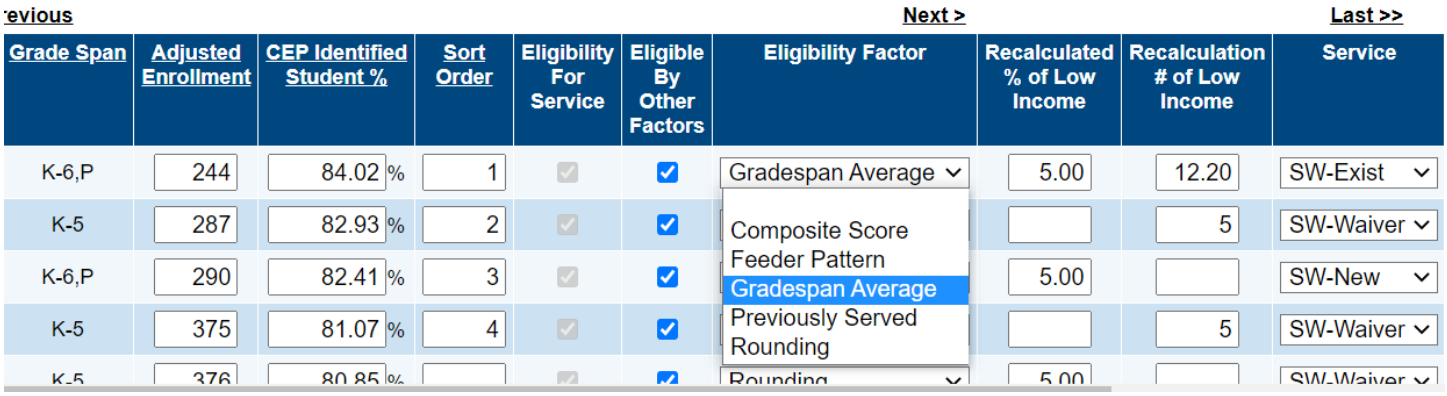
district determined that the building would receive Title I services while in the second building they opted not to serve that building.

Public School	Grades Served	Enrollment	Eligible for FRPL	Poverty Percentage	Eligible for Service	Sort by Poverty	Sort by Grade Span	District Determination
A	6-8	600	456	76%	Yes	1	1	Yes
Elementary School Grade Span								
B	K-5	400	185	46.3%	Yes	2	2	Yes
C	K-5	450	160	35.6%	Yes	4	3	Yes
D	K-5	400	140	35.0%	Yes	5	4	Yes
E	K-5	600	206	34.3%	Yes	7	5	Yes
F	K-5	450	100	22.2%	No	10	6	No
Elementary School Totals		**2350**	**791**	**33.7%**				
Middle School Grade Span								
G	6-8	750	300	34.6.%	Yes	6	8	No
H	6-8	800	260	32.5%	No	8	9	No
I	6-8	840	250	29.8%	No	9	10	No
Middle School Totals		**2,390**	**810**	**33.9%**				
High School Grade Span								
J	9-12	2,600	941	36.2	Yes	3	7	Yes
District Totals		**7,940**	**2998**	**37.8%**				

In this sample, if the district would have determined to use straight poverty level to rank order, they could only serve buildings A, B,C,D, and J. If they had used grade span, then building poverty level then E and G would not be eligible for services. If they had selected the rounding option for building G, it would be eligible for services because the poverty level would round to 35%, the cut-off for Title I services. Building E could not be found eligible using the rounding option though.

If a district decides that it wants to use grade span averaging, it will need to modify the building eligibility page and upload documentation for this option. Please contact your consultant to implement this new option to assist with correctly completing the building eligibility page.

Building Eligibility Page: The building eligibility page has been updated to allow for all of these options in the FY 22. You will notice that when you go to this page, there is now a drop-down option that allows for the additional flexibilities to determine building eligibility. These include feeder pattern for secondary schools, rounding, previously served, and the composite score.



Once you have selected which flexibility eligibility factor you want to use from the drop down menu. You will need to determine the recalculated % of low income and the recalculated # of low income students on the columns to the right of the drop down menu. Be sure to provide the report that was used for the calculations as well as the calculations in the upload function on the bottom of the page. Your federal programs consultant will need to validate that the information is correct.