Ohio | Department of Education

Title I and U.S. Department of Agriculture Community Eligibility Option

What is the Community Eligibility Option?

Community eligibility is the newest U.S. Department of Agriculture option available that allows schools with high percentages of low-income students to provide free breakfast and lunch to all students. Districts and community schools electing to participate in this program should consider how their participation affects Title I allocations.

This link contains information on Community Eligibility Option.

What is the relationship between the Community Eligibility Option and Title I funding?

Federal Title I funds are currently allocated through four statutory formulas that are based primarily on census poverty estimates and the cost of education in each state. This link provides information on Improving Basic Programs Operated by school districts, as part of Title I, Part A. The Community Eligibility Option should not affect the total amount of Title I funds that a district receives. However, Community Eligibility Option program participation affects how Title I funds are allocated to each school building.

The number of children receiving free or reduced school lunches does not impact a district's award of Title I, Part A funds. The primary factors in determining a district's Title I, Part A allocation are the Census Bureau's annually-updated estimate of the number of children ages 5-17 residing in families below the poverty line in each school district and each state's per-pupil expenditures that the states report to the National Center for Education Statistics. School lunch data does not factor into either of these data elements.

The U.S. Department of Education issued a letter regarding the impact of Community Eligibility Option program participation and Title I funding. The letter is available here. Districts typically use school lunch data to distribute Title I, Part A funds between schools. This is why the letter focuses on in-district allocations by building and not total district allocation.

This U.S. Department of Education guidance explains how Title I, Part A funds flow from the federal level to state agencies to local districts and schools.

How should in-district Title I school allocations be determined?

When annually determining the eligibility of a Community Eligibility Option school to receive Title I funds, districts and community schools must assume that the percentage of economically disadvantaged students in the school is proportionate to the percentage of meals for which that Community Eligibility Option program school is reimbursed by the U.S. Department of Agriculture for the same school year. Thus, to calculate this percentage, the district or schools must multiply the number of students, identified by the direct certification data by the statutory multiplier specified in the Healthy, Hunger Free Kids Act of 2010, and then divide that amount by the enrollment in the school.

What percentage should be used to calculate in-district Title I school allocations?

The district or school must use the Community Eligibility Option program reimbursement percentage (Identified Students percentage * 1.6 multiplier) for participating schools, or total enrollment, whichever is less. Low-income percentage (also known as free and reduced lunch percentage) should be used for schools not participating in the Community Eligibility Option program.

If either a district or a school is approved for Community Eligibility Option program participation in Fiscal Year 2014, what low-income data should be used on the CCIP Consolidated Title I Building Eligibility page?

School districts and community schools can enter the most current school year counts for free and reduced lunch as their low-income data on the Title I Building Eligibility page. If your district or school has applied for Community Eligibility Option program participation in Fiscal Year 2014, your approval will come before August 30, 2013. The Fiscal Year 2014 CCIP Consolidated Application will open in the early part of June. Districts and schools are strongly advised to submit their Fiscal Year 2014 consolidated applications by July 1, 2013, in order to establish their Substantially Approved Date to obligate funds.

If a district or school was approved for Community Eligibility Option program participation in Fiscal Year 2013, how should its data be entered into the CCIP Consolidated Title I Building Eligibility page?

The Title I Building Eligibility page in Fiscal Year 2014 CCIP Consolidated Application has been updated to accommodate additional measures of poverty used to determine in-district Title I allocations. Districts that have schools participating in the Community Eligibility Option program will have the columns labeled **CEO Identified Student %** and **CEO Reimburse %** pre-populated for the participating schools from the Claims Reimbursement and Reporting System. The columns labeled **FRPM Number** and in **FRPM %** for Community Eligibility Option program participating schools will be blank.

Building Eligibility

2014 - Consolidated - Rev 0 - Title I

Save And Go To

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 Option (CEO), 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
				FRPM Number	FRPM %	CEO Identified Student %	CEO Reimburse %					
019638	Lake Elementary School	1-4	155			80.0	100		☑	☐	☐	
007286	High School	10-12	314			75.0	100		☑	☐	☐	
037622	Grove foot Elementary School	1-4	124			55.00	88.00		☑	☐	☐	
010702	E Middle School	5-7	116	84	72.41 %				☑	☐	☐	
064774	Cottage Elementary School	K-4	284			41.0	65.6		☑	☐	☐	
136010	Cove School	8-9	200	69	34.50 %				☐	☐	☐	

Total Enrollment:	1193	
Total Low Income Number:	917.42	
Total District-wide Low Income Percent:	76.90	%

If a district has many Community Eligibility Option program schools with a 100 percent reimbursement rate, can a larger per-pupil allocation be given to the school with a greater percentage of Identified Students to determine its Title I school allocations?

Yes, as long as the school district ensures that it follows Title I within-district allocation requirements. Accomplishing this will take some careful analysis on the district's part, especially for a district that has a combination of Community Eligibility Option program-participating and non-Community Eligibility Option participating schools.

For example: A school district determines a Title I school allocation by multiplying the number of low-income students in the school by a per-student amount established by the district. Title I regulations indicate that a school district is not required to allocate the same per-pupil amount to each participating school, as long as the district allocates higher per-pupil amounts for schools with higher concentrations of poverty than to schools with lower concentrations of poverty. Therefore, in the case of a school district that has more than one Community Eligibility Option program school at the 100 percent reimbursement rate with different Community Eligibility Option Identified Students percentages, the district may use a higher per-pupil amount for the 100 percent school with the higher percentage of Community Eligibility Option Identified Students.

Community Eligibility Option Identified Students data gives a clear indication of a higher concentration of poverty of the school when compared to the other 100 percent schools. In other words, the Community Eligibility Option Identified Student data may be used to differentiate among multiple Community Eligibility Option program participating schools with a 100 percent reimbursement rate. At the same time, however, to ensure Title I compliance, the school district must ensure that the 100 percent schools receive at least as much per pupil

allocation as do Community Eligibility Option program participating and non-participating schools with lower poverty rates. For instance, a non-participating school with a 99 percent poverty rate could not receive more per student allocation than a participating school with a 100 percent reimbursement rate.

The following table provides an example of this comparison.

Col. 1	*Col. 2*	*Col. 3*	*Col. 4*	*Col. 5*	*Col. 6*	*Col. 7*	*Col. 8*	*Col. 9*
School	CEO School (Y/N)	Enrollment	# CEO Identified Students	% CEO Identified Students	# low-income students for Title I school allocation calculation*	% of low-income students for ranking Title I schools	Per-student amount	Allocation
1	Y	500	400	80%	500	100%	$750	$375,000
2	Y	1500	1050	70%	1500	100%	$650	$975,000
3	N	500	N/A	N/A	450	90%	$625	$281,250
4	Y	500	250	50%	400	80%	$625	$250,000

*For a Community Eligibility Option school, this figure is equal to the lesser of: (a) Column 3 or (b) Column 4 multiplied by 1.6.

School 1 and School 2 are Community Eligibility Option schools with percentages of low-income students of 100 percent by virtue of the 1.6 multiplier. As a result, they are ranked at the top of the school district's poverty rankings. The district allocates more per pupil to School 1 than School 2 on the basis of School 1having a higher percentage of Community Eligibility Option Identified Students (Column 5). At the same time, the district ensures that School 2 receives at least as much per pupil as School 3 and School 4 because the poverty percentage for School 2 in Column 7, after the application of the 1.6 multiplier, is larger than that of School 3 or School 4.

If a district used a grouping of schools or the whole district as a group for Community Eligibility Option to determine U.S. Department of Agriculture claiming percentage, can this percentage be used to determine Title I school allocations?

No. The Elementary and Secondary Education Act requires a district with an enrollment of at least 1,000 students to rank schools in order of poverty to determine which schools are eligible to receive Title I funds and the amount of Title I funds eligible schools receive. Accordingly, to establish this ranking there must be a poverty percentage determined for each individual school. Although two or more schools are grouped for Community Eligibility Option to determine the U.S. Department of Agriculture claiming percentage, for Title I purposes, each school would be ranked by their individual percentages.

How should low-income data be entered into the CCIP Title I Building Eligibility page in the following case? There are separate schools that share a physical building where all students are served meals. For Community Eligibility Option purposes, the sum of the student

enrollment from each separate school located in that physical location is used to generate the Identified Students number. For accountability and funding purposes these schools with the same physical location are considered separate schools.

Assuming that these are separate schools under state law, federal law requires a district with an enrollment of at least 1,000 students to rank schools in order of poverty to determine which schools are eligible to receive Title I funds and the amount of Title I funds eligible schools receive. Accordingly, to establish this ranking there must be a poverty percentage determined for each individual school. In this instance, even if for Community Eligibility Option purposes the reported count is based on the building total that includes more than one school, for Title I purposes the district must use the Community Eligibility Option program data from each school within the building to calculate the individual school allocations.

How should a Community Eligibility Option community school report Economically Disadvantaged Student data to the School Options Enrollment System?

Historically, the Ohio Department of Education has relied on the Free and Reduced Price Lunch form for identification of economically disadvantaged students for the purposes of Title I funding. Because Community Eligibility Option program schools no longer may use this application for the school meal program, the department developed a new process to identify and count economically disadvantaged students for Title I allocation. To determine the eligibility of Community Eligibility Option program community school students for state and federal program benefits other than school meals, a Community Eligible Option community school can direct certify by using the direct certification software provided by the Office of School Nutrition at the department or a Community Eligibility Option community school can request that their students' parents or guardians complete the Household Information Survey form. All siblings of students that are directly certified are also eligible. The form can be found here.

Economically disadvantaged students must be entered into the School Options Enrollment System so they can be uploaded into the Federal Low Income Count System.

After all economically disadvantaged Community Eligibility Option community school students have been counted, a formula adjusted poverty count will be calculated. These adjusted poverty counts are provided to the Ohio Department of Education's Office of Grants Management and comprise one of the components in the Title I funding formula.

How should low-income data be entered into the CCIP Title I Building Eligibility page in the following case? A community school separates grades into different physical buildings. For school lunch purposes, it reports school lunch count data for each individual physical site where children are served meals. Each separate physical site has its own identified student percentage. The Ohio Department of Education considers the school as one entity.

According to state law, a charter school with different physical buildings is considered one educational entity. For Title I purposes the school should combine program counts from these different physical buildings to derive one Community Eligibility Option percentage.