

District Calculation of Title I A Equitable Service Amounts

The U.S. Department of Education's November 2016 guidance on equitable services clarified that districts' Title I equitable services amounts must be calculated based on their total counts of low-income students, regardless of those students' eligibility. Once these equitable services amounts are calculated, public districts and nonpublic schools must engage in "timely and meaningful consultation" to identify and serve the students with the greatest need. As a result of the 2016 guidance, Ohio's Nonpublic Data System (NPDS) collection process has changed. The NPDS no longer requires nonpublic schools to enter Title I eligibility counts and no longer requires identification of at least one Title 1-eligible student before determining nonpublic school participation. The guidance below explains and offers examples of how the Nonpublic Data System will calculate districts' equitable services amounts.

EXPANDED SERVICES

The NPDS will calculate a district's Title I-A equitable services amount based on the number of students from low-income families who live in a participating public school's attendance area and attend a private school. However, students who receive equitable services are identified based on their needs, not low-income status. The *Elementary and Secondary Education Act*, amended by the *Every Student Succeeds Act*, expanded the scope of Title I services. These now include services for students in need of interventions, such as counseling and mentoring, in addition to services for students who are academically at risk.

CALCULATION PROCESS

To determine a district's total Title I equitable services amount, the NPDS aggregates the number of students from low-income families residing in each of the district's participating public school attendance areas, whether they attend public or private schools. The system then determines the overall proportion of public and private students from low-income families residing in participating public school attendance areas.

Note: Previously, to generate an equitable services amount, the NPDS required a district to have at least one Title I-eligible student. Starting in the 2019-2020 school year, the NPDS will generate equitable services amounts for all participating nonpublic schools based only on their numbers of low-income students. Nonpublic schools that want to participate in Title I and will need an amount of Title 1 funds set aside for equitable services will need to report their total numbers of low-income students per public building attendance area and agree to participate in the NPDS. The Department will enhance the NPDS to reflect these changes when it opens in February 2019.

CALCULATION STEPS

(Ohio's NPDS performs steps 2-4.)

- Step 1: District establishes the participating public school attendance areas.
- Step 2: Determine the number of children from low-income families residing in each participating public school attendance area who attend public schools and private schools.
- Step 3: Determine the overall proportion of children from low-income families who reside in participating public school attendance areas and attend public schools and private schools.
- Step 4: Using the proportion of children from low-income families who attend private schools, determine the amount of funds available for equitable services based on that proportionate share of the district's total Title I allocation.

CALCULATION EXAMPLE

For example, a district with four Title I public school attendance areas and a total Title I allocation of \$1,000,000 would determine the total amount available for all equitable services this way:

EXAMPLE OF DETERMINING THE AMOUNT OF TITLE I FUNDS FOR EQUITABLE SERVICES					
Public School Attendance Area	Number of Public School Low-Income Children	Number of Private School Low-Income Children	Total Number of Low-Income Children	Proportion of Title I Allocation	Equitable Services Amount
A	500	120	620	.19	\$193,548
B	300	9	309	.03	\$29,126
C	200	6	206	.03	\$29,126
D	350	15	365	.05	\$49,315
TOTAL	1,350	150	1,500	.10	\$100,000

CONSULTATION PROCESS

“Timely and meaningful consultation” between the nonpublic schools and their public districts is a very important part of this process. Nonpublic school principals will enter low-income data in the NPDS and the system reports this to the public building attendance area. The public district is responsible for verifying low-income counts. Once a nonpublic school qualifies to participate in Title I, the school and public district begin discussing student needs, best-suited services and how to identify children as eligible for Title I services. They must complete sheets listing the criteria used to rank order and identify children for services, regardless of the types of Title I services they will be receiving.

NON-PARTICIPATION

If a nonpublic school reports low-income student counts but does not wish to participate in Title I equitable services, other participating nonpublic schools must receive those unclaimed, nonpublic equitable services amounts. These amounts are not returned to the public district.

QUESTIONS

If you have questions about the process for the calculating nonpublic equitable service amounts, please contact Chantelle Carter, Office of Federal Programs ombudsman, at chantelle.carter@education.ohio.gov or (614) 466-5203.

RESOURCE

U.S. Department of Education guidance (Section O-2):

<https://www2.ed.gov/policy/elsec/leg/essa/essaguidance160477.pdf>