

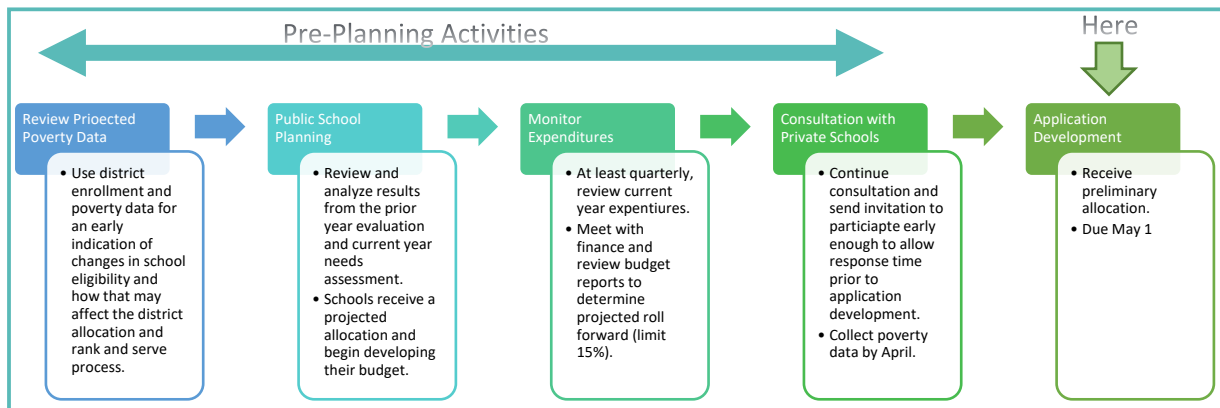


Allocating Title I, Part A Funds to Public Schools

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The process for allocating funds to public schools starts during the prior school year with pre-planning activities. This document attempts to assist with the application phase of this process.





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I. "Off-the-Top" District-Level Reservations

[ESEA section 1113](#); [34 C.F.R. § 200.77](#)

Gather the following data to complete this section:

- Preliminary Title I, Part A Allocation
- Public School Enrollment and Poverty Counts
- Participating Private School Enrollment and Poverty Counts

1. Calculate the proportionate rate of funding for participating private schools and reserve an equitable share of funding. (Area of Focus 6)

- See [Equitable Share Calculation Tip Sheet](#)

[Florida statute 1011.69\(4\)](#); [ESEA section 1117\(a\)](#); [34 C.F.R. §§ 200.64\(a\)](#) and [200.77\(d\)](#)

2. Reserve funds for Family Engagement. (Area of Focus 2)

- An LEA with an allocation that exceeds \$500,000 reserves at least 1%, but no more than 2%, of the district's total Title I allocation (less the amount for families of private school children).
- For example, the Title I, Part A allocation is \$3 million, the FE reservation is 1.5%, the total reservation amount is \$45,000, less the amount for private school families.

[Florida statute 1011.69\(4\)\(a\)\(1\)](#), [ESEA section 1116\(a\)\(3\)\(A\)](#)

3. Reserve funds for administrative costs. (Area of Focus 11)

- The reservation must be a necessary and reasonable amount that includes the [district's indirect costs](#), not to exceed a total of 10 percent. The reservation cap is applied to the sum of administrative costs for public and private schools.

[Florida statute 1011.69\(4\)](#); [34 C.F.R. § 200.77\(e\)](#)

4. Reserve funds as necessary to provide comparable services for:

- Children experiencing homelessness (Area of Focus 3)
- Children in local institutions for delinquent children, and neglected children or delinquent children in community day programs, if appropriate (Area of Focus 4)

[Florida statute 1011.69\(4\)](#); [ESEA section 1113\(c\)\(3\)\(A\)](#); [34 C.F.R. § 200.77\(a\)](#)

5. Make other reservations as determined by the district/school(s) needs assessment.

- Early Childhood Education (Area of Focus 5)
 - When there isn't enough funding for all to participate, prioritize funding based on academic need.
- Transportation for Foster Children (Area of Focus 7)



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- College & Career Readiness (Area of Focus 8)
 - If implemented as a district initiative, roll forward funds are used.
- Educational Services Funded at the LEA Level (Area of Focus 9)
 - A necessary and reasonable amount, not to exceed 1% of the Title I, Part A allocation.
- Attract and Retain Qualified and Effective Teachers (Area of Focus 10)
 - No more than 5 percent of the Title I, Part A allocation to provide incentives and awards to teachers who serve in Title I schools identified for comprehensive support and improvement activities or targeted support and improvement activities.
 - If implemented as a district initiative, roll forward funds are used.

[Florida statute 1011.69\(4\)](#); [ESEA section 1113\(c\)\(4\) and \(5\)](#); [34 C.F.R. § 200.77\(b\) and \(f\)](#)

6. Determine the amount of funding remaining that will be allocated to public schools on the PSES.
- Subtract the total off-the-top reservations from the Title I, Part A allocation.
 - Add any roll forward funds that will be allocated to public schools.
 - This is the total amount available for public schools.

[Florida statute 1011.69\(4\)](#)

II. District's Allocation Procedure

Use the next sections to explore the requirements and options for allocating Title I, Part A funds to public schools. The allocation process will be different for each district and is based on the needs of the district and individual schools. The following should be addressed in the allocation process:

- The data (year, source) used to rank and serve schools.
- The district will serve all schools above 75% first, in rank order, before allocating funds to schools at/below 75% poverty. (1113(a)(3)(A))
- Will the district serve any schools at/below 75%? (1113(a)(4))
- Will the district grade span group? (1113(a)(4)(B))
- What is the district's threshold for serving schools? (F.S. 1011.69(4))
- Will the district use the special option in 1113(a)(3)(B) to serve high schools with poverty rates between 50% and 75%, prior to allocating funds to other schools?
- Will the district split fund any schools?
- Will the district skip any schools? (1113(b)(1)(D))



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- Will the district use projected data for any schools (traditional or charter) due to newly opening, significantly expanding, rezoning, restructuring, or closing? (FDOE K Code Guidance)
- Will the district “grandfather” any ineligible schools? (1113(b)(1)(C))
- Will the district use feeder patterns for secondary schools? (1113(a)(5)(B) and (C))

III. Rank Schools by Poverty Rate and Allocate Funds in Order [ESEA section 1113; 34 C.F.R. 200.78](#)

The rules in this section for allocating funds to schools do not apply to certain districts:

- with fewer than 1,000 students.
- that only consist of one school.

[ESEA section 1113\(a\)\(6\)](#)

Select the data that will be used to rank schools.

- Select the measure of poverty under section 1113(a)(5)(A) used to identify, rank and serve eligible schools.
 - “Shall be the number of children aged 5 through 17 in poverty.”
- Districts should use the most recent and accurate data available. Consult with the FDOE on which year of data is most appropriate.
- A charter school that newly opens or significantly expands its enrollment by November 1 of the current school year and provides written notice to the district at least 120 days in advance of the opening or expanding, receives an allocation based on current year data within 5 months of the opening or expansion. ([34 C.F.R. § 76.788\(a\)](#))
- A charter school that newly opens or significantly expands its enrollment after November 1 but before February 1 of an academic year receives at least a pro rata portion of its Title I allocation on or before the date the district allocates funds to other public schools for the succeeding year. ([ESEA section 4306\(b\)\(2\)](#); [34 C.F.R. §§ 76.792\(b\), 76.793\(b\)\(1\)](#)).
- A charter school that newly opens or significantly expands its enrollment on or after February 1 may receive a pro rata portion of its Title I allocation, if the district deems it appropriate. ([34 C.F.R. § 76.792\(c\)](#)).

Federal and State Guidance on Poverty Measures



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2022 Within-District Allocations US ED Non-Reg Guidance	2023–2024 FDOE PSES / NPSES Workbook Guide 2015 US ED CEP Guidance
<p>Districts have the option to use choose between:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Census data <input type="checkbox"/> FRPL data <input type="checkbox"/> Temporary Assistance for Needy Families (Title IV, Part A of Social Security Act) <input type="checkbox"/> Medicaid program eligibility <input type="checkbox"/> A composite of such indicators (i.e. direct certified data) 	<p><u>Combination of CEP and non-CEP Schools</u></p> <ul style="list-style-type: none"> • Use direct certified (DC) data for CEP schools, including the use of the multiplier, and meal application data (FRPL). <ul style="list-style-type: none"> ○ For non-CEP schools, sum SV3 report columns O, P, Q, and R under “Eligibility Survey Application.” ○ For CEP schools, sum SV3 report columns T and U, multiplied by 1.6. • Use only DC data only for all schools without the 1.6 multiplier. • Use only DC data only for all schools with the 1.6 multiplier. <p><u>No School Participate in CEP</u></p> <ul style="list-style-type: none"> • Use one of the follow data options: <ul style="list-style-type: none"> ○ Sum of SV3 report columns O, P, Q, and R under “Eligibility Survey Application”. ○ Sum of SV3 report columns T and U ○ Sum of SV3 report columns T and U, and apply the 1.6 multiplier <p><u>Direct Certification Data Only (no multiplier)</u></p> <ul style="list-style-type: none"> • Use DC data. (Sum of SV3 report columns T and U) • The 1.6 multiplier is not applied. <p><u>Direct Certification Data Only (with multiplier)</u></p> <ul style="list-style-type: none"> • Use DC data multiplied by 1.6.

1.6 Multiplier

- The function of the 1.6 multiplier is to provide an estimate of the percentage of students eligible for free and reduced-price meals in participating CEP schools that is comparable to the poverty percentage that would be obtained in a non-CEP school. The number of students directly certified is a subset of the total number of students eligible for free and reduced-price meals. Using only the number of identified students would result in lower poverty percentages for CEP schools.
- Used in options 1 and 4 on the PSES.

[USED 2015 CEP Guidance](#); [2023–2024 FDOE PSES / NPSES Workbook Guide](#)



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Feeder Pattern Option for Secondary Schools

- In some circumstances, it is difficult to collect poverty data in secondary schools. In this case, a district has the flexibility to apply the average poverty rate of elementary schools (or middle schools, or both elementary and middle) that feed into one or more secondary schools to the number of children enrolled in the secondary school.
- Before a district may use feeder patterns to determine the poverty percentage of secondary schools, it 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.

For example:

School	Enrollment	CLIF	Poverty Rate
A Elementary	1000	975	98%
C Middle	2000	1700	85%
D Elementary	600	400	67%
E Elementary	1400	785	56%
Average Elementary Poverty Rate: 76%			
F Middle	800	800 x 76% = 608	76%
G Middle	1250	1250 x 76% = 918	73%
I High	3400	3400 x 76% = 2,584	76%
I High	988	988 x 76% = 751	76%

[ESEA section 1113\(a\)\(5\)\(B\) and \(C\); 34 C.F.R. § 200.78\(a\)\(2\)](#)

Threshold

- The threshold refers to the lowest poverty rate the district will serve schools as Title I.
- The district selects the appropriate threshold annually. It cannot exceed:
 - The threshold the district used in the 2016-2017 school year, or
 - *Refer to the FDOE-approved 2016-2017 PSES.*
 - The state poverty average.
 - *Refer to <https://edudata.fldoe.org/>; State Report Card → Population & Enrollment → Economically Disadvantaged.*

[Florida statute 1011.69\(4\)](#)

School Eligibility

- In general, schools are Title I-eligible if the poverty rate is greater than or equal to the district poverty rate, with these exceptions:
 - Desegregation programs: Districts may apply for a waiver to serve any school participating in a desegregation plan if the school has at least 25 percent poverty.
 - 35 percent rule: Schools with at least a 35% poverty rate may be served.



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- Split Funding: Districts may fund a school in an otherwise ineligible attendance area if the school's poverty rate line among its enrolled students equals or exceeds the poverty rate in an eligible attendance area.
- Grandfathering: Districts may serve a non-eligible school for one additional year if it was eligible the preceding year.
- Skipping: A district may skip an eligible school if: 1) The school meets the comparability requirements from Section 1118(c); 2) the school is receiving supplemental funds from other state or local sources that are spent for programs that meet the requirement of Title I; and 3) those funds are at least the same amount as what would have come from Title I, Part A.

[ESEA section 1113\(a\)\(7\) and 1113\(b\)\(1\)\(A\)-\(D\); 34 C.F.R. § 200.77](#)

School Program Model

Schoolwide Program	Targeted Assistance Program
<input type="checkbox"/> Schools with poverty rates from 40% to 100%, unless the school receives a waiver from FDOE. Section 1114(a)(1)	<input type="checkbox"/> Schools with poverty rates from 35% to 100% Section 1115(a)

Option for High Schools

- After serving all schools above 75% poverty, if funds remain, an LEA may choose to serve high schools with a poverty percentage between 50% and 75% in rank order of poverty.
- The implementation of this option occurs before serving any other grade span.

[ESEA section 1113\(a\)\(3\)\(B\)](#)

District poverty average

- A school is Title I eligible when the poverty rate is at least 35% or the district's poverty average, whichever is lowest.
- Sum the enrollment and CLIF for all served schools, then divide enrollment by the CLIF to determine the district poverty average.

[34 C.F.R. § 200.78\(a\)\(3\)](#)

Grade Span Grouping

- After all schools above 75% poverty have been served, the district can group the remaining schools by grade span. It is the district's decisions which grade spans and which schools within each grade span to serve.



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- To determine the eligibility of the schools within each grade span, the district can use the district poverty average or the poverty rate of the grade spans.
 - If the district uses the poverty rate of the grade spans to determine eligibility, only schools with poverty rates of at least that amount are eligible to be served.

For example:

School	Poverty Rate	Grade Span Poverty Rate	Eligible to be Served?
A Elementary	100%		Yes, must serve.
C Middle	78%		Yes, must serve.
D Elementary	75%	73%	Yes
E Elementary	70%		No
F Middle	65%	65%	Yes
G Middle	64%		No
H High	60%	54%	Yes
I High	47%		No

- If the district uses the district poverty average to determine eligibility, only schools with poverty rates of at least that amount are eligible to be served.

For example:

School	Poverty Rate	Eligible to be Served?
A Elementary	100%	Yes, must serve.
C Middle	78%	Yes, must serve.
D Elementary	75%	Yes
E Elementary	70%	Yes
F Middle	65%	No
G Middle	64%	No
H High	60%	No
I High	47%	No
District Poverty Avg	70%	

[ESEA section 1113\(c\)\(2\)\(A\)](#)

Grandfathering

- Districts may serve a non-eligible school for one additional year if it was eligible the preceding year.

[ESEA section 1113\(b\)\(1\)\(C\)](#)

Per Pupil Allocations and the 125% Rule

- A district is not required to allocate the same PPA to each Title I school. If the district allocates different PPAs to schools, the district must allocate a higher PPA to schools with higher poverty rates than it allocates to schools with lower poverty rates. The



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flexibility to allocate more funds on a per-pupil basis to a higher-poverty school represents an opportunity for a district to distribute Title I funds in a manner that may be more equitable than allocating the same amount of funds per-pupil to every school.

- If the district serves any school below 35% poverty, the district is required to allocate a PPA that is at least 125% of the district’s allocation per low-income child.
 - The district’s allocation per low-income child is the district’s Title I, Part A Allocation before any reservations are made, divided by the public and private CLIF.

For example:

Title I, Part A Allocation (before reservations are made)	\$3,500,000
Total CLIF (Public CLIF + Private CLIF)	10,000
125% PPA	350

[ESEA section 1113\(c\)\(2\)\(A\); 34 C.F.R. § 200.78\(c\)](#)

Acronyms & Terms:

- CEP – Community Eligibility Provision
- CLIF – Children from Low-Income Families
- DC – Direct Certified
- DPA – District Poverty Average
- FRPL – Free and Reduce Price Lunch (under the Richard B. Russell National School Lunch Act)
- PPA – Per Pupil Allocation
- PSAA – Public School Attendance Area (i.e., Title I School)
- Serve – to allocate funding to an eligible school