

## Methods of Determining the Private School Count (Title I-A)

This module offers explanations on each method that a local education agency (LEA) and private school may use to determine the private school count for the [Title I-A allocation](#). In this document, LEA is synonymous with “district.”

In each of these methods<sup>i</sup>, the private school count must include enrollments from each district’s Title I-A school for which it enrolls students. For example, if a private school enrolls students from a district’s Title I-A elementary school and two Title I-A high schools, the total count for this district would be a combination of all three schools. The equitable share would then be allocated based on a per-pupil amount.

During consultation, the district and private school can agree to determine the private school count every year or every other year.

### **Method 1: The same measure of poverty used to count public school children.**

- School Nutrition Programs (SNP) such as Free and Reduced-Price Lunch (FRPL) or Direct Certification data is used to count the number of private school students residing in each Title I-A school attendance area.
- The district and the private school should use the exact same data set to determine the total number of students counted. For example, both the district and the private school should use FRPL data or both should use Direct Certification.

#### Example:

*A private school has a total enrollment of 100 students. (Each figure represents 10 students.)*



*Of the 100 students, only 50 are eligible because they reside within Title I-A public school attendance areas. (Eligible students are designated by a green circle.)*



*Of the 50 eligible students, 30 are identified as experiencing poverty using Direct Certification. (Identified students are designated by a red X.)*



*The total number of private school students counted for determining the equitable share is 30/50, or 60% experiencing poverty.*

**Method 2a: Poverty data from a survey when complete, accurate data is obtained.**

- The [Title I Family Income survey](#) is distributed to all 40 private school families residing in Title I-A school attendance areas. Of the 40 private school students receiving a survey, all 40 students returned it. Of the returned surveys, 15 students qualify as experiencing poverty. *Students experiencing poverty are 15/40, or 38%.*
  - Step 1: During consultation, the private school and district decide if the returned surveys constitute complete, accurate data. Complete, accurate data means that all students whose households are experiencing poverty have returned a survey, and only students from households above the income threshold have not returned a survey. If the private school agrees, a return rate lower than 100% can still constitute complete, accurate data. For example, if the only households who do not return the survey reside within a Title I-A public school attendance areas with a lower percent poverty, the household pays full tuition to the private school, the household resides within a high-income neighborhood of a Title I-A public school attendance area, or other similar factors.
  - Outcome: Income data from the 40 returned surveys show 15 students are counted to determine the equitable share.

Example:

*A private school has a total enrollment of 100 students. (Each figure represents 10 students.)*



*Of the 100 students, only 40 are given surveys because they are the only ones residing within Title I-A public school attendance areas. (Eligible students are designated by a green circle.)*



*Of the 40 students given surveys, all 40 returned it. Therefore complete, accurate data has been collected. (Students who returned the survey are designated by a red X.)*



*Of the 40 returned surveys, 15 students are identified as experiencing poverty. (Students identified as experiencing poverty are designated by a blue box.)*



*The total number of private school students counted for determining the equitable share is 15/40, or 38% experiencing poverty.*

**Method 2b: Poverty data from a survey where complete, accurate data is not obtained; but the survey is representative.**

- The [Title I Family Income survey](#) is distributed to all 40 private school families residing in Title I-A school attendance areas. Of the 40 private school students receiving a survey, 30 students returned it. Of the 30 surveys, 15 students qualify as experiencing poverty. *Students experiencing poverty of the returned surveys are 15/30, or 50%.*
  - **Step 1:** During consultation, the district and private school decide if the 30 returned surveys are representative. To be representative, the district and private school would agree that the percent poverty rate from returned surveys (50%) is representative of the poverty of all 40 students residing in Title I-A school attendance areas. *Note: unless there is a reason to believe that the data is not representative (see Method 2c, Step 1), it can be assumed that it is.*
  - **Step 2:** The family poverty percentage from the 30 returned surveys (50%) is extrapolated to the 10 unreturned surveys.
  - **Outcome:** Extrapolation calculates that 50% of the unreturned 10 surveys equals 5 students. The total number of students counted for the equitable share is 15 from the returned surveys plus 5 from extrapolation, equaling 20 total students.

**Example:**

*A private school has a total enrollment of 100 students. (Each figure represents 10 students.)*



*Of the 100 students, 40 are given surveys because they are the only ones residing within Title I-A public school attendance areas. (Eligible students are designated by a green circle.)*



*Of the 40 students given surveys, 30 returned it. (Students who returned the survey are designated by a red X.)*



*Of the 30 returned surveys, 15 students are identified as experiencing poverty. (Students identified as experiencing poverty are designated by a blue box.)*



*Of the remaining 10 students who did not return the survey, the extrapolated poverty rate is 50% resulting in 5 additional students. (Students with extrapolated poverty are designated by an orange box.)*



*The total number of private school students counted for determining the equitable share is 15 + 5 = 20 students, or 20/40, or 50% experiencing poverty.*

**Method 2c: Poverty data from a survey where complete, accurate data is not obtained; and the survey is not representative.**

- The [Title I Family Income survey](#) is distributed to all 40 private school families residing in Title I-A school attendance areas. Of the 40 private school students receiving a survey, 30 returned it. Of those 30 surveys, 15 students qualify as experiencing poverty. *Students experiencing poverty from the returned surveys is 15/30, or 50%.*
  - Step 1: During consultation, the district and private school agree that the data from the surveys is not representative, e.g. most of the unreturned surveys are from high-income neighborhoods whose families are less likely to qualify based on income; the poverty rate of the returned surveys is much higher or lower than the district’s poverty rate for the Title I-A public school; etc.
  - Step 2: The district and the private school must decide together how to determine the poverty rate of the 10 unreturned surveys, such as proportionality (see Method 4).
  - Outcome: Proportionality determines that 2 of the 10 unreturned surveys are experiencing poverty. The total number of students counted for the equitable share is 15 from the returned surveys plus 2 from proportionality, equaling 17 total students.

**Example:**

*A private school has a total enrollment of 100 students. (Each figure represents 10 students.)*



*Of the 100 students, 40 are given surveys because they are the only ones residing within Title I-A public school attendance areas. (Eligible students are designated by a green circle.)*



*Of the 40 students given surveys, 30 returned it. (Students who returned the survey are designated by a red X.)*



*Of the 30 returned surveys, 15 students are identified as experiencing poverty. (Students identified as experiencing poverty are designated by a blue box.)*



*Of the remaining 10 students who did not return the survey, the proportional poverty rate is 20%, counting 2 of 10 students (Students who did not return the survey but have proportional poverty are designated by an orange box.).*



*The total number of private school students counted for determining the equitable share is 15 + 2 = 17 students, or 17/40, or 42.5% experiencing poverty.*

**Method 3: Comparable data from a different source.**

- The district uses FRPL data, and the private school uses scholarship data or need-based financial aid data to determine income levels of each family residing in Title I-A school attendance areas.
- The threshold of the scholarship or need-based financial aid must be the same or similar to the FRPL income threshold.
- If the private school has household income data on file, they can use the thresholds indicated on the [Title I Family Income Survey](#) to determine eligibility.
- All private school income data must have been collected within the last two years for it to be used.

**Example:**

*A private school has a total enrollment of 100 students. (Each figure represents 10 students.)*



*Of the 100 students, 50 are eligible because they reside within Title I-A public school attendance areas. (Eligible students are designated by a green circle.)*



*Of the 50 eligible students, 30 are identified as experiencing poverty using scholarship data. (Identified students are designated by a red X.)*



*The total number of private school students counted for determining the equitable share is 30/50, or 60% experiencing poverty.*

**Method 4: Proportionality**

- The private school provides the district with the addresses, grade levels and ages of 50 students residing in a Title I-A school attendance area.
- The district has identified the Title I-A public school to have 60% poverty using either FRPL or Direct Certification data.
- The same poverty rate, 60%, is applied to the 50 eligible private school students who reside within the Title I-A school attendance area, resulting in 30 students being counted for the equitable share.

Example:

*A private school has a total enrollment of 100 students. (Each figure represents 10 students.)*



*Of the 100 students, 50 are eligible because they reside within a Title I-A public school attendance area. (Eligible students are designated by a green circle.)*



*Of the 50 eligible students, 30 are identified as experiencing poverty using the district's poverty rate of 60% for the Title I-A public school. (Identified students are designated by a red X.)*



*The total number of private school students counted for determining the equitable share is 30/50, or 60% experiencing poverty.*

### **Method 5: An equated measure**

- The district determines the proportional relationship between three sets of known data in order to calculate a fourth unknown data point for the private school. The unknown data point is used as the private school's count.
- The data cannot double count students, e.g.: if a student is counted as eligible for Temporary Assistance for Needy Families (TANF), they cannot also be counted as eligible for FRPL even if they are eligible for both benefits.
- The district has data that in a Title I-A public school attendance area 10 public school students qualify for TANF, 20 public school students qualify for FRPL, and 5 private school students qualify for TANF. Using a proportional relationship, the district can use the cross multiply and divide method to calculate that 10 private school students would be counted for the equitable share.

$$\frac{10 \text{ public TANF}}{20 \text{ public FRPL}} = \frac{5 \text{ private TANF}}{x \text{ private FRPL}} \Rightarrow 10 \text{ private FRPL}$$

#### **Example:**

*There are a total of 100 students, both public and private, residing in a single Title I-A public school attendance area. (Each figure represents 10 students.)*



*Of the 100 students, 10 are public school students eligible for TANF (Designated by a green circle.), 20 public school students are eligible for FRPL (Designated by a purple circle.), and 5 private school students are eligible for TANF (Designated by an orange circle.)*



*Using the equation above, it is calculated that 10 private school students would be eligible for FRPL and counted for the equitable share. (Identified students are designated by a red check X.)*



*The total number of private school students counted for determining the equitable share is 10.*

---

<sup>i</sup> [Title I-A Equitable Services NRG](#) (2023) B-11, B-11a, B-11b, [ESEA](#) sections 1117(c)(1)(B), (c)(1), [34 CFR § 200.64\(a\)\(3\)\(i\)](#)