

Calculating the Proportional Share

Calculation of the Proportional Share for Title IA

Under the Every Student Succeeds Act (ESSA), a district must determine the amount of funds available for providing equitable services prior to any expenditures or transfers of funds. This includes all reservations previously taken “off the top” of district’s Title IA allocation, including reservations for administration, parental involvement, and district-wide initiatives.

A private school’s allocation is based on **POVERTY and RESIDENCE**. Once a district has established the participating public school attendance areas (see B-1 and B-2 of the *Title I Services to Eligible Private School Children*), it **would determine the number of children from low-income families residing in each participating public school attendance area** who attend public schools and private schools. There are four methods for determining poverty: free and reduced lunch, income survey, proportionality and tuition/scholarship information. The method for determining poverty is agreed upon during consultation.

The district determines the overall proportion of children from low-income families who reside in participating public school attendance areas who attend public schools and private schools. Using the proportion of children from low-income families who attend private schools, the district would determine the amount of funds available for equitable services based on the proportionate share of the district’s total Title IA allocation. For example, a district with four Title I public school attendance areas and a total Title IA allocation of \$1,000,000 would determine the total amount for all Title IA equitable service activities (proportionate share) as follows:

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 <u>Low-Income</u> Children	Total Number of Low-Income Children
School A	500	120	620
School B	300	9	309
School C	200	6	206
School D	350	15	265
Total	1350	150	1500
Proportionate Share Percentage	90%	10%	
Proportionate Share Allocation	\$900,000	\$100,000	

District Administrative Costs for Managing the Private School Program

Districts may reserve a **reasonable amount** of the private school proportionate share to administer the private school program at the district level; however, this amount should never exceed the district’s negotiated indirect rate in order to ensure the maximum amount is put toward the private schools.

Calculation of the Proportional Share for Title IIA

The amount an LEA must reserve to provide equitable services for private school teachers and other educational personnel for Title IIA services is based on the LEA’s total Title IIA allocation, less administrative costs. The LEA determines the amount of funds available for Title IIA equitable services for private school



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teachers and other educational personnel by calculating, on a per-pupil basis, the amount available for all public and private school students enrolled in participating private elementary and secondary schools in areas served by the LEA (regardless of a student’s residency), taking into consideration the number and needs of the children, their teachers and other educational personnel to be served.

EXAMPLE OF FORMULA TO DETERMINE AMOUNT FOR TITLE IIA EQUITABLE EXPENDITURES

Table A: Number of Students	Number of Students
A1: LEA Enrollment	900
A2: Participating Private Schools Enrollment	100
A3: Total Enrollment = A1 + A2	1,000

Table B: Title IIA Allocation	Total Allocation
B1: Total LEA Allocation	\$1,000,000
B2: Administrative Costs (for public and private school programs)	\$50,000
B3: LEA Allocation Minus Admin Costs = B1-B2	\$950,000

Table C: Per Pupil Rate	Per Student Allocation
C1: B3 divided by A3	\$950

Table D: Equitable Services	Allocation Available to Private Schools
Amount LEA must reserve for equitable services for private school teachers and other educational personnel = A2 x C1	\$95,000

An LEA may continue to use Title IIA funds to provide professional development activities for teachers, principals, and other school leaders to address the specific needs of their students. Additionally, there may be other permissible uses of Title IIA funds for the benefit of private school participants. Any use of Title IIA funds for the benefit of private school participants must:

- Be an allowable local use of Title IIA funds under the authorizing statute. (ESEA section 2103(b)(3).)
- Meet the specific needs of students enrolled in a private school, and not the school itself. Title IIA funds may not be used to meet the needs of a private school or the general needs of the students enrolled in the private school. In some instances, however, a program or activity that primarily benefits a private school’s students (because it addresses specific, rather than general, needs of the students) will also incidentally benefit the school. (34 CFR 76.658.)
- Ensure that the public agency (e.g., an LEA) responsible for providing equitable services retains control of the funds used to provide such services. In addition, equitable services must be provided by either an employee of the public agency or through a contract by the public agency with an individual, association, agency, or organization. These employees, individuals, associations, agencies, or organizations providing the services must be independent of the private school and any religious organization and the employment or contract must be under the control and supervision of the public agency. (ESEA section 8501(d).)

Equitable services under Title IIA may not be used for class-size reduction (ESEA section 2103(b)(3)(D)) in a private school because contracts for private school teachers and staff would be inconsistent with the



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requirements in ESEA section 8501(d) regarding public control of funds and the supervision and control of employees or contractors.

Title III

Title III's proportional share for private schools begins with the annual district count of all English Learners (ELs) enrolled in participating private schools. This count is collected each spring for the following school year Title III allocations. All ELs included in this count are added to the district's EL count for a per student Title III allocation. Private schools participating in Title III having identified English learners are entitled to the Title III per student allocation less the allowable Title III administrative/indirect rate of no more than 2% districts may choose to keep.

Important Note

Federal funds are never provided directly to the private school. Rather the district serves as the fiscal agent for the private school, reimbursing providers for their services.