

## New Hampshire Department of Education Title I, Part A

# **Equitable Services Proportional Share Guidance**

Office of ESEA Programs
25 Hall Street
Concord, NH 03301

#### **Purpose**

The purpose of Title I, Part A of the ESEA is to provide all children significant opportunity to receive a fair, equitable, and high-quality education and to close educational achievement gaps (ESEA section 1001). Each LEA that receives Title I, Part A funds identifies public school attendance areas and schools that have high concentrations of children from low-income families as eligible to participate in Title I, Part A programs. (ESEA section 1113).

ESEA section 1117 requires participating LEAs, in consultation with appropriate non-public school officials, to provide eligible children attending non-public non-profit elementary and secondary schools, their teachers, and their families with Title I, Part A services or other benefits that are equitable to those provided to eligible public-school children, their teachers, and their families. Eligible non-public school children are children who reside in a participating Title I, Part A public school attendance area and are low achieving.

The New Hampshire Department of Education (NHED) recommends that one person be designated at the district to oversee consultations. An LEA must annually contact officials of each non-public school with children who might reside in the LEA attendance area to determine whether those officials would like for their eligible students to participate in Title I, Part A equitable services. The goal of consultation is agreement between the LEA and appropriate non-public school officials on how to provide equitable and effective programs for eligible non-public school children.

ESEA requires a LEA to consult with non-public school officials regarding the size and scope of the equitable services to be provided, the proportion of funds that is allocated for equitable services, and how that proportion is determined. Once final allocations are available, the ESEA requires an LEA to provide this information to non-public school officials and the State Education Agency (SEA).

The SEA is then responsible, in accordance with ESEA section 1117(a)(4)(C), to provide notice in a timely manner to appropriate non-public school officials the allocation of funds for educational services and other benefits that the LEA has determined are available for eligible non-public school children, their teachers, and their families. NHED, Office of ESEA Programs, will collect this information semi-annually (August and February) to meet this requirement.

LEAs should coordinate with the participating non-public schools to appropriately budget for the correct share of equitable services the district must provide to the non-public schools. NHED has developed a Title I, Part A <u>Equitable Services Proportional Share Calculator</u> that can be used to calculate the appropriate share for a school district. The calculator is not a requirement of the LEA, it is intended to be a useful resource for the LEA to utilized.

Refer to the <u>Title I, Part A Non-Regulatory Guidance for Equitable Services</u> for additional information pertaining to equitable services requirements of the LEA who receives Title I, Part A funds.

#### Providing Title, I, Part A Equitable Services

The following steps should be taken to ensure the district is meeting the equitable service requirement:

- 1. Designate one person from the district to act as the district liaison.
- 2. Contact all <u>non-public schools</u> within the LEAs boundaries that may have students eligible to participate in Title I, Part A programs—i.e., students who live in a participating Title I, Part A public school attendance area in the LEA. An LEA also has a responsibility to contact non-public schools outside the district if the LEA has reason to believe students who reside in a participating Title I, Part A public school attendance area attend those schools.
  - a. Districts without non-public schools in their boundary must still complete the <u>'Equitable Services for Non-Public School Students'</u> form by checking off Option 1 and sign to complete.
- 3. Send each non-public school the Equitable Services Affirmation with a reasonable deadline for a response (i.e., 30 days).
  - a. Attempt at least three times before assuming no response. The same form should be used for each attempt with the date of each attempt.
  - b. If the non-public school does not respond after three attempts, attach evidence. Evidence may include phone log, email, and/or certified letter receipt. NHED highly recommends that districts send a certified letter as their final attempt.
- 4. During consultation with the non-public school:
  - a. Determine the indirect costs and any administrative cost (limit of 2%) charged by the district. Refer to the Indirect Cost Allocation Plan for LEAs and Public Charter Schools.
  - b. Determine an accurate count of children from low-income families who attend public and non-public schools and reside in the participating Title I, Part A public school attendance area to allocate the proportional share utilizing one of the below methods:
    - 1) The same measure of poverty used to count public school children (low-income counts);
    - 2) Proportionality (Free and Reduced Lunch Data);
    - 3) Comparable poverty data from a survey;
    - 4) Comparable poverty data from a different source; or
    - 5) An equated measure.
  - c. Use the <u>Title I, Part A Equitable Services Proportional Share Calculator</u> along with the equitable services calculator guidance below to calculate necessary Title I, Part A equitable services proportional share contributions for the non-public schools in the LEAs attendance area.
- 5. Collect all forms and check for completion.
- 6. Deadline for submission will be indicated on the form. The LEA must provide a copy to NHED by:
  - Emailing to ESAffirmation@doe.nh.gov and
  - Uploading the document to the LEA Homepage in the Grants Management System (GMS).
- 7. The LEAs grant will not be made 'Substantially Approved' until all applicable Equitable Services Affirmations are provided, reviewed, and approved as fully executed. The LEA must maintain a copy of this form in its records.
- 8. The NHED, Office of ESEA Programs, will collect the LEA's proportional share contributions for the non-public schools in the LEAs attendance area semiannually (August and February).

#### **Determining Methods and Sources of Poverty Data**

An LEA is required to consult with non-public school officials on the method or sources of data that are used to determine the number of children from low-income families in participating school attendance areas who attend non-public schools; this data is used to calculate the proportional share of Title I, Part A funds available for equitable services.

Consultation must occur before the LEA makes any decision that affects the opportunities of eligible non-public school children to participate in the Title I, Part A program. <u>ESEA permits an LEA</u>, based on timely and meaningful consultation, to use the below five methods to allocate the non-public school proportional share. After consultation, the LEA has the final authority to decide which method it will use to calculate the eligible number of low-income families residing in the Title I, Part A public school attendance areas attending non-public schools.

Choose one of the below methods to determine the Title I, Part A proportional share for equitable services:

**Method 1** (pg. 5) - The same measure of poverty used to count public school children – The LEA uses the same measure of poverty used to count public school children that is available for private school students, if it has been determined that the data will yield an accurate count of non-public school students. <u>EOY Free and Reduced Eligibility Rate by District.</u>

**Method 2** (pg. 8) - Comparable poverty data from a survey — The LEA sends a survey to families with children who reside in participating Title I, Part A public school attendance areas to obtain poverty data comparable to those used for public school students to determine a low-income family count.

**Method 3** (pg. 11) - Comparable poverty data from a different source – The LEA uses poverty data for non-public school children from a different source than the data it uses for public school children so long as the income threshold in both sources is generally the same.

**Method 4** (pg. 14) - Proportionality – The LEA applies the low-income percentage of each participating Title I, Part A public school attendance area (<u>Free and Reduced School Lunch Eligibility</u>) to the number of non-public school children who reside in that school attendance area to derive the number of non-public school children from low-income families.

**Method 5** (pg. 17) - An equated measure – The LEA uses an equated measure of low-income by correlating sources of data by determining the proportional relationship between two sources of data on public school children and applying that ratio to a known source of data on non-public school children.

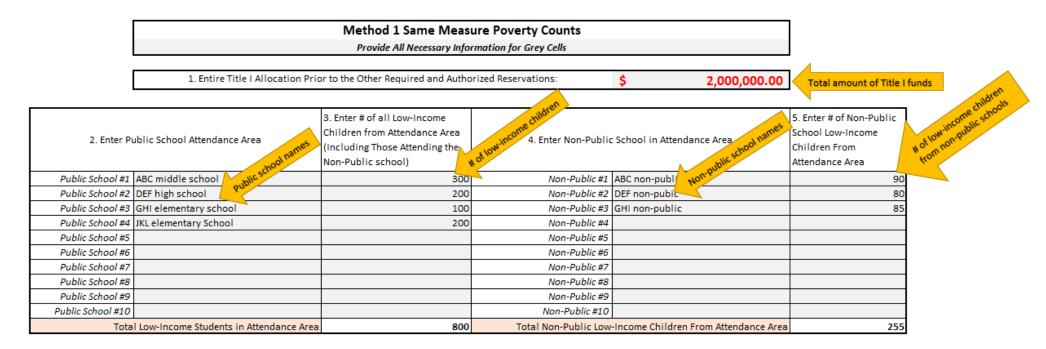
Utilize the 'sheet' on the Title I, Part A Equitable Services Calculator that correlates with the method and source of poverty data that would best calculate the non-publics Title I, Part A proportional share determined during consultation with the non-public.

After the LEA has calculated out the non-public proportional shares for each non-public school, if there are additional equitable service funds available, the LEA must adjust each non-public school's pre-pupil amount to evenly distribute the left-over funds. In addition, an LEA may have Title II or Title IV, Part A funds transferred into their Title I, Part A allocation during the year. If a transfer takes place, the LEA must re-calculate the equitable services proportional share for the non-public schools that they have obligations to provide Title I, Part A funding to.

#### **Method 1: Same Measure Poverty Counts**

Note: Only enter data in the grey colored cells; all other cells will automatically be calculated.

- 1. Enter the LEAs entire Title I, Part A allocation prior to the other required and authorized reservations, as well as prior to any expenditures or transfers of funds.
- 2. Enter each public school in the LEA attendance area.
- 3. Enter number of all low-income children from attendance area. This number includes children attending the public school and non-public school.
- 4. Enter non-public school name in LEA attendance area.
- 5. Enter number of non-public school low-income children from attendance area.



- Step 2 The proportional share will automatically calculate based on the total low-income children and total non-public low-income children from the LEA attendance area.
- Step 3 The proportional share of parent and family engagement reservations will automatically populate if the Title I, Part A equitable services allocation exceeds \$500,000.00.
- Step 4 Determine the indirect cost, if a negotiated rate is set, and any administrative cost (limit of 2%) charged by the district.
  - 6. Enter the indirect cost percentage.
  - 7. Enter the percentage set aside for administrative cost.
- Step 5 The proportional share of Title I, Part A funds available for equitable services after parent and family reservations, indirect costs, and administrative costs will automatically populate.

	Proportion	al Share		1	ntag
Public School	Public School			Proportional share p	ercenta
68.13%			31.88%		
Determined Proportional Share of Title I Funds	for Equitable Services	Proportional Share of Parent Title I Equitable Services Allo			
services proportional share 31.88%			1%		
\$	637,500.00	\$ age		6,375.00	
Determined Proportional Share of Title I Fund: % for Parent and Family Engagement Reserva	tions			631,125.00	
6. Enter the Indirect Cost Percentage	3.80%	Set Aside for Indirect Cost	\$	23,982.75	
7. Enter the Percentage Set Aside for					Share
Administrative Cost (2% unless	2.00%	Set Aside for Admin Cost			
therwise dictated by the grant)	Percenta	ge set aside for admin cost	\$	12,622.50	char
roportional Share of Title I Funds for Equitab	le Services After Parent and	Family Reservation, Indirect		1	Share
Cost and Admin Cost			\$	619,764.75	
Amount of Allocation Remaining After Required	d and Authorized Title I Equit	table Service Proportional		1,362,500.00	

Amounts Available From Propo	Amount available per child			
Non-Public School in Attendance Area		# of Non-Public School Low-	Per-Child Amount	pount avail
		Income Children From School	\$ 2,430.45	Amount per non-public school
Non-Public #1	ABC non-public	90	\$ 218,740.50	A ner non-P
Non-Public #2	DEF non-pubic	80	\$ 194,436.00	Amount P
Non-Public #3	GHI non-public	85	\$ 206,588.25	
Non-Public #4			\$ -	
Non-Public #5			\$ -	
Non-Public #6			\$ -	·e
Non-Public #7			\$ -	a above
Non-Public #8			\$ -	, match share
Non-Public #9			\$ -	chould rtiona.
Non-Public #10			\$ -	Should match share above proportional share above
Total Non-Public Low-Incom	ne Children From Attendance Area	255	\$ 619,764.75	

#### **Method 2: Survey Poverty Counts**

Note: Only enter data in the grey colored cells; all other cells will automatically be calculated.

- 1. Enter the LEAs entire Title I, Part A allocation prior to the other required and authorized reservations, as well as prior to any expenditures or transfers of funds.
- 2. Enter the number of representative samples of the survey data collected for the attendance area.
- 3. Enter the number of low-income families from the survey data.
- 4. Enter each public school in the LEA attendance area.
- 5. Enter the number of all children from attendance area. This number includes children attending the public school and non-public school.
- 6. Enter the non-public school's name in the LEA attendance area.
- 7. Enter the number of low-income non-public children determined from the survey for each non-public school in the attendance area.

	Method 2 Survey F	Poverty Counts			
	Provide All Necessary Infor				
				4	
	1. Entire Title I Allocation Prior to the Other Required and A	uthorized Reservations:	\$ 2,000,000.00	Total amount of Title I Part A	
	Representative Sample of Survey Data LEA Collected from Attendance     Area	800	Numbe	er of surveys collected	
	3. # of Low-Income Families from Survey Data	500	Number of lo	ow-income families determined from surv	
	Percentage of Children from Low-Income Families in Representative Sample	62.50%			
			_		
4. Enter Public School Attendance Area	5. Enter # of all Children from Attendance Area (Including Those Attending the Non-Public school)	6. Enter Non-Public School in	Attendance Area	7. Enter # of Low-Income Non-Public School Children From Survey	
Public School #1 ABC middle school	500	Non-Public #1 A	BC non-public	200	
Public School #2 DEF high school	600	Non-Public #2 D	EF non-pubic	200	
Public School #3 GHL elementary school	700	Non-Pul G	HI non-public	students from non-public 100	
Public School #4 hentary School	of low income children 500	Non-public school names  Non-public school names  Non-public #5		srom non-r	
Public School names	income chi	blic school -Public #5		students II	
Public school name  Public school #7	of low-in	Non-Public #6	income	Str	
Publichool #7		Non-Public #7	# of low-ii		
Public School #8		Non-Public #8	"		
Public School #9		Non-Public #9			
Public School #10		Non-Public #10			
Total # of children in Attendance Are	a 2300	Total Survey Count of Low Income Non-Po	ublic School Children From	500	
Total Low-Income Students in Attendance Are	a 1437.5	Attendance Area		500	

- **Step 2 -** The proportional share will automatically calculate based on the total low-income children calculated from the representative survey sample and total non-public low-income children determined from the representative survey sample for the LEA attendance area.
- **Step 3** The proportional share of parent and family engagement reservations will automatically populate if the Title I, Part A equitable services allocation exceeds \$500,000.00.
- Step 4 Determine the indirect cost, if a negotiated rate is set, and any administrative cost (limit of 2%) charged by the district.
  - 6. Enter the indirect cost percentage.
  - 7. Enter the percentage set aside for the administrative cost.
- **Step 5** The proportional share of Title I, Part A funds for equitable services after parent and family reservations, indirect costs, and administrative costs will automatically populate.

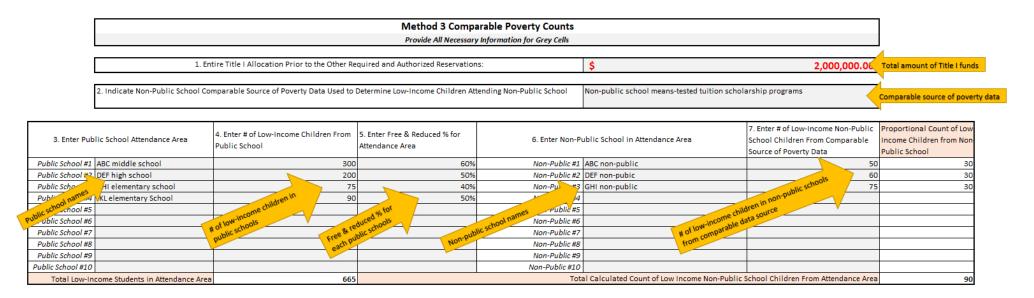
	Proportion	al Share Proportional share p	ercentages
Public School		Non-Public S	
65.22%		34.78%	6
Determined Proportional Share of Title I Fund	ls for Equitable Services	Proportional Share of Parent and Fam	
ices proportional share 34.78%		Title I Equitable Services Allocation E	kceeds \$500,000.00
\$	695,652.17		6,956.52
Determined Proportional Share of Title I Fun 1% for Parent and Family Engagement Reserve	ds for Equitable Services After ations	\$ percentage	688,695.65
6. Enter the Indirect Cost Percentage	3.80%	Set Aside for Indirect Cost	\$ 26,170.43
7. Enter the Percentage Set Aside for Administrative Cost (2% unless	2.00%	Set Aside for Admin Cost	
otherwise dictated by the grant)		set aside for admin cost	\$ 13,773.91
Proportional Share of Title I Funds for Equita Admin Cost	ble Services After Parent and	Family Reservation, Indirect Cost and	\$ 676,299.13
Amount of Allocation Remaining After Require	ed and Authorized Title I Equit	table Service Proportional Share	\$ 1,323,700.87

Non-Public School	n Attendance Area	# of Non-Public School Low-Income	Per-Child Amount	Amount available pe
Non Tubile School	Tracerdance Area	Children From School	\$ 1,352.60	Amount per non-pub
Non-Public #1	ABC non-public	200	\$ 270,519.65	ount per
Non-Public #2	DEF non-pubic	200	\$ 270,519.65	Amou
Non-Public #3	GHI non-public	100	\$ 135,259.83	-
Non-Public #4			\$ -	
Non-Public #5			\$ -	
Non-Public #6			\$ -	
Non-Public #7			\$ -	
Non-Public #8			\$ -	natch share
Non-Public #9			\$ -	should match proportional share
Non-Public #10			\$ -	Shopore
Total Non-Public Low-In	come Children From Attendance Area	500	\$ 676,299.13	A

#### **Method 3: Comparable Poverty Counts**

Note: Only enter data in the grey colored cells; all other cells will automatically be calculated.

- 1. Enter the LEAs entire Title I, Part A allocation prior to the other required and authorized reservations, as well as prior to any expenditures or transfers of funds.
- 2. Enter the non-public school comparable source of poverty data used to determine low-income children attending the non-public schools.
- 3. Enter each public school in the LEA attendance area.
- 4. Enter the number of all low-income children from public school attendance area.
- 5. Enter the free and reduced percentage for each public-school attendance area.
- 6. Enter the non-public school's name in the LEA attendance area.
- 7. Enter the number of low-income non-public children from each non-public school in the attendance area based on the comparable source of poverty data.



- **Step 2 -** The proportional share will automatically calculate based on the total low-income public school children and total low-income non-public school children from the LEA attendance area.
- **Step 3** The proportional share of parent and family engagement reservations will automatically populate if the Title I, Part A equitable services allocation exceeds \$500,000.00.
- Step 4 Dermine the indirect cost, if a negotiated rate is set, and any administrative cost (limit of 2%) charged by the district.
  - 8. Enter the indirect cost percentage.
  - 9. Enter the percentage set aside for the administrative cost.
- **Step 5** The proportional share of Title I, Part A funds for equitable services after parent and family reservations, indirect costs, and administrative costs will automatically populate.

	Propor	tional Share	ional share percentages	
Public School	ol	Piopo	Non-Public School	
86.47%		1	13.53%	
Determined Proportional Share of Title I Fu	unds for Equitable Services	Proportional Share of Parent Equitable Services Allocation	and Family Engagement Reservations if Exceeds \$500,000.00	Title I
ble services proportional share 13.53%		de la companya de la	1%	
Ş	270,676.69	S centals		-
Determined Proportional Share of Title I For After 1% for Parent and Family Engagement	unds for Equitable Services	Cost percentage	270	,676.69
Arter 1% for Parent and Parinty Engagement	Indirec	***************************************	270,	,070.05
8. Enter the Indirect Cost Percentage	3.80%	Set Aside for Indirect Cost	\$ 10,	,285.71
9. Enter the Percentage Set Aside for				,413.53
Administrative Cost (2% unless	2.00%	Set Aside for Admin Cost		V
otherwise dictated by the grant)	Percent	tage set aside for admin cost	\$ 5,	,413.53
Proportional Share of Title I Funds for Equ	itable Services After Parent an	d Family Reservation, Indirect		
Cost and Admin Cost			\$ 265,	,804.51
Amount of Allocation Remaining After Requ	uired and Authorized Title I Equ	itable Service Proportional		
Share			\$ 1,729,	,323.31

Amounts Available From Pro	oportional Share of Title I Fu	unds to Serve Eligible Stu	idents in Ea	ach Non-Public School	we per child
Non-Public School in A	Attendance Area	# of Non-Public School Low- Income Children From School	\$	Per-Child Amount 2,953.38	Amount available per child  Amount per non-public school
Non-Public #1	ABC non-public	30	\$	88,601.50	int per no.
Non-Public #2	DEF non-pubic	30	\$	88,601.50	Amount
Non-Public #3	GHI non-public	30	\$	88,601.50	
Non-Public #4			\$	-	
Non-Public #5			\$	-	
Non-Public #6			\$	-	
Non-Public #7			\$	-	above
Non-Public #8			\$	-	atch share a
Non-Public #9			\$	-	auld monal 3.
Non-Public #10			\$		Should match share above
Total Non-Public Low-Incor	me Children From Attendance Area	90	\$	265,804.51	A.

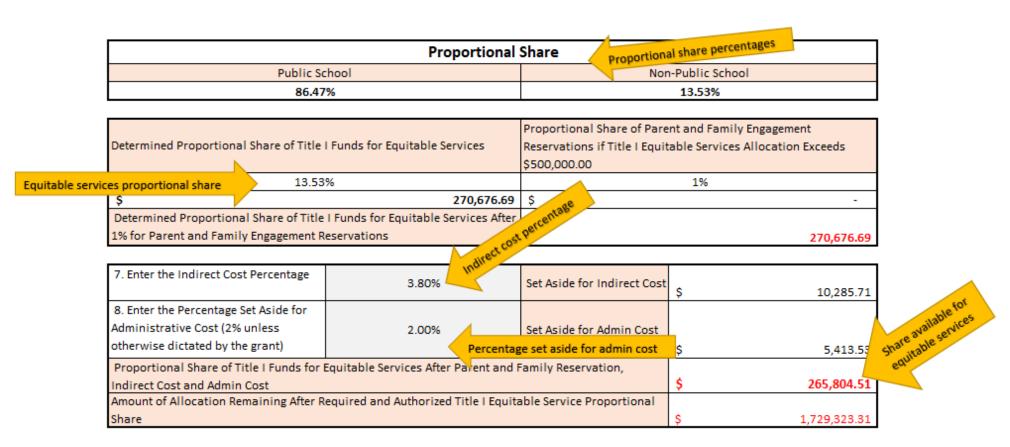
### **Method 4: Proportionality Poverty Counts**

Note: Only enter data in the grey colored cells; all other cells will automatically be calculated.

- 1. Enter the LEAs entire Title I, Part A allocation prior to the other required and authorized reservations, as well as prior to any expenditures or transfers of funds.
- 2. Enter each public school in the LEA attendance area.
- 3. Enter number of all low-income children from public school attendance area.
- 4. Enter the free and reduced percentage for each public-school attendance area.
- 5. Enter non-public school name in LEA attendance area.
- 6. Enter number of non-public children from each non-public school in the attendance area.

		Method 4 Proportionality P	overty Counts			1		
Provide All Necessary Information for Grey Cells								
1. Er	tire Title I Allocation Prior to the Other Rec	quired and Authorized Reservations:		\$	2,000,000.00	Total amount of Title I fo		
2. Enter Public School Attendance Area	Enter # of Low-Income Children From Public School	4. Enter Free & Reduced % for Attendance Area	5. Enter Non-Pub	lic School in Attendance Area	6. Enter # of Non-Public School Children From Attendance Area	Proportional Count of Low Income Children from Nor Public School		
Public School #1 ABC middle school	300	60%		ABC non-public	50	30		
Public School #2 DEF high school	200	50%		DEF non-pubic	60	30		
Public School # SHI elementary school	aublic 75		Non-Public#	non-public	hools 75	30		
Public School hames Lelementary School  Public school hames Lelementary School  Built School #6	of Low-income children in public 90	10 to	Non annes	o in I	non-public schools 75			
ublic school #6	1 OW-incom	ee & reduced tools	Non-Public #6	of children				
Public School #7	chools	ach pub.	Non-Public #7	#0				
Public School #8	scho	200	Non-Public #8					
Public School #9	·		Non-Public #9					
Public School #10			Non-Public #10					
Total Low-Income Students in Attendance A	ea 665		Total Calculated Cour	nt of Low Income Non-Public School Ch	ildren From Attendance Area	90		

- **Step 2 -** The proportional share will automatically calculate based on the total low-income public school children and total low-income non-public school children from the LEA attendance area.
- **Step 3** The proportional share of parent and family engagement reservations will automatically populate if the Title I, Part A equitable services allocation exceeds \$500,000.00.
- Step 4 Determine the indirect cost, if a negotiated rate is set, and any administrative cost (limit of 2%) charged by the district.
  - 7. Enter the indirect cost percentage.
  - 8. Enter the percentage set aside for administrative cost.
- **Step 5 -** The proportional share of Title I, Part A funds for equitable services after parent and family reservations, indirect costs, and administrative costs will automatically populate.

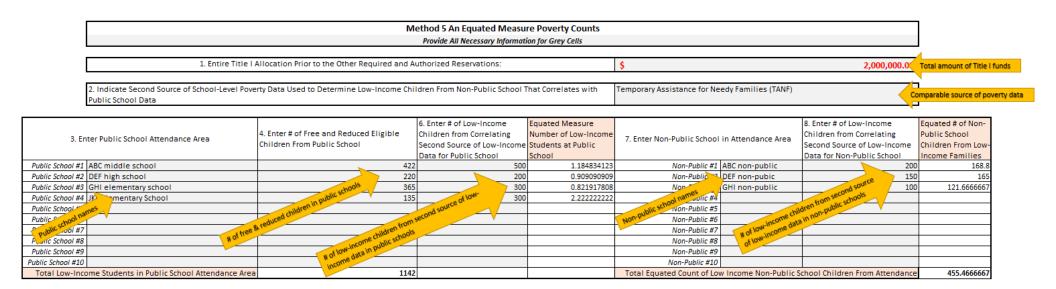


Non-Public School in	Attendance Area	# of Non-Public School Low-Income Children		Per-Child Amount	Amount available per
		From School	\$	2,953.38	non-pub
Non-Public #1	ABC non-public	30	\$	88,601.50	unt per in
Non-Public #2	DEF non-pubic	30	\$	88,601.50	Amour
Non-Public #3	GHI non-public	30	\$	88,601.50	
Non-Public #4			\$	-	
Non-Public #5			\$	-	
Non-Public #6			\$	-	
Non-Public #7			\$	-	
Non-Public #8			\$	-	ych ware?
Non-Public #9			\$	-	should match share a
Non-Public #10			\$	-	Shoundrio
Total Non-Public Low-Inc	ome Children From Attendance Area	90	s	265,804.51	brok

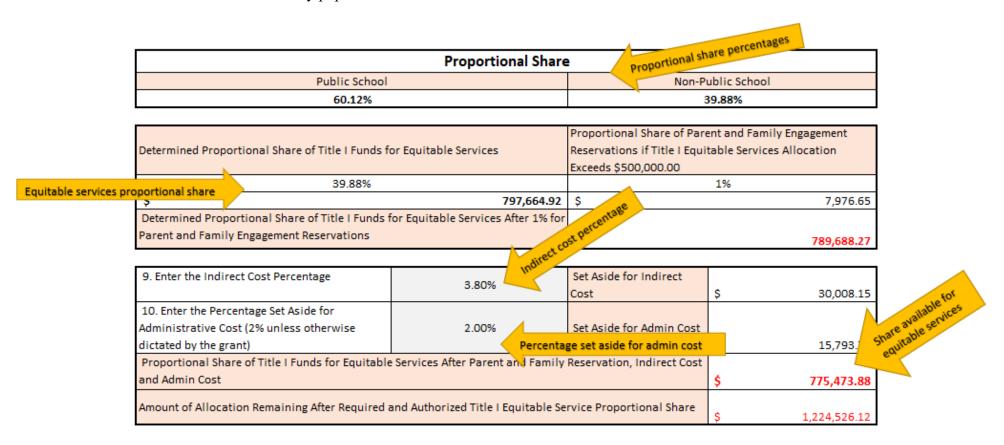
#### **Method 5: An Equated Measure Poverty Counts**

Note: Only enter data in the grey colored cells; all other cells will automatically be calculated.

- 1. Enter the LEAs entire Title I, Part A allocation prior to the other required and authorized reservations, as well as prior to any expenditures or transfers of funds.
- 2. Enter the second source of school-level data used to determine low-income children from non-public school that correlates with public school data.
- 3. Enter each public school in the LEA attendance area.
- 4. Enter the number (do not enter the percentage) of free and reduced eligible children from public school attendance area.
- 5. Enter the number of low-income children from a correlating second source of low-income data for each public school.
- 6. Enter the non-public school's name in LEA attendance area.
- 7. Enter number of low-income children from correlating second source of low-income data for each non-public school.



- **Step 2 -** The proportional share will automatically calculate based on the total low-income children from the public schools and total equated low-income children from the non-public schools in the LEA attendance area.
- **Step 3** The proportional share of parent and family engagement reservations will automatically populate if the Title I, Part A equitable services allocation exceeds \$500,000.00.
- Step 4 Determine the indirect cost, if a negotiated rate is set, and any administrative cost (limit 2%) charged by the district.
  - 9. Enter the indirect cost percentage.
  - 10. Enter the percentage set aside for administrative cost.
- **Step 5** The proportional share of Title I, Part A funds for equitable services after parent and family reservations, indirect costs, and administrative costs will automatically populate.



Amounts Available From Proportional	nounts Available From Proportional Share of Title I Funds to Serve Eligible Students in Each Non-Public School						
	Non-Public School in Attendance Area  L F		Per-Child Amount	, available E			
Non-Public School in Atter				Amount available per child			
			\$ 1,702.59	Amount per non-public school			
Non-Public #1	ABC non-public	168.8	\$ 287,397.52	Sount per			
Non-Public #2	DEF non-pubic	165	\$ 280,927.67	Amo			
Non-Public #3	GHI non-public	121.6666667	\$ 207,148.69				
Non-Public #4			\$ -				
Non-Public #5			\$ -				
Non-Public #6			\$ -				
Non-Public #7			\$ -	a above			
Non-Public #8			\$ -	I match share			
Non-Public #9			\$ -	Should match share above			
Non-Public #10			\$ -	propo			
Total Non-Public Low-Incom	ne Children From Attendance Area	455.4666667	\$ 775,473.88				