

11. Identifying Eligible Buildings

Statutory Requirement: Section 1113

Overview

This section focuses on how a school district identifies eligible schools in order to allocate Title I funds to buildings which serve children from low income families. This determination includes specifics about calculating poverty level, per pupil amounts, and district discretion in these areas.

Determination of Schools Eligible For Title I

- Eligibility for Title I funds and services is determined for each attendance area in a district. An attendance area is a geographical area from which resident children would normally attend a specific public school. Attendance areas are usually referred to by the school's name.
- A district has several options in how to rank and serve eligible schools. Ranking schools must be done every year with the ESEA Consolidated Application using one of the following options:
 - a. District Poverty Average. All district schools are ranked in order of percentage of children from low income families. Schools in which the poverty average is equal to or greater than the poverty average for all schools in the district are eligible.
 - b. Grade span grouping using district poverty average percent. Schools are ranked by grade span (elementary, middle, high) in rank order as compared to district poverty average.
 - c. Grade span grouping using grade span poverty percent. Schools are ranked by grade span. The poverty percentages are compared only with other schools in their grade span. A district may choose to serve the highest poverty schools in any or all of the grade spans.
 - d. Less than 1,000 students exemption. A district may serve all schools regardless of poverty percent.
 - e. Only one school per grade span exemption A district may serve all schools regardless of poverty percent

Note: all schools with a poverty level of 75 percent or above must be served.

Calculation of Poverty Level

- Poverty levels are determined by the students enrolled. Enrollment numbers include students at least five years old, but less than 18 when the enrollment count is taken, usually the second-semester January count. The district may use any of the following methods, or a combination of more than one, to calculate poverty levels.
- The number of children eligible for free and reduced price lunches under the National School Lunch Act. (This is the most commonly used method.)
- The number of children in poverty as measured in the most recent census data by the United States Census Bureau.
- The number of children in families receiving assistance under Temporary Assistance to Needy Families (called Wisconsin Works or W2 in Wisconsin).
- The number of children eligible to receive medical assistance under the Medicaid program.
- A combination of such measures with respect to all attendance areas in the district.

Calculation of Per Pupil Amounts

Per-Pupil amounts are determined by the district. The same per-pupil amount can be allocated for each eligible school, or smaller amounts may be allocated for lower-poverty school. A school may not receive a smaller per-pupil amount than another that falls below it in rank order. In the following example, note that the school with the lowest poverty level receives more total money. However, the per-pupil amounts are in descending order as required.

School	Grade Span	Percent Low Income	Per Pupil Allocation	Attendance Area Allocation
School A (25 low income students)	K-5	41%	\$925	\$23,125
School B (40 low-income students)	K-5	32%	\$900	\$36,000
School C (65 low income students)	K-5	25%	\$825	\$53,625

- Funds must be allocated to school buildings on the basis of poverty, not for other reasons determined at the district level.
- Schools must design their programs in consultation with parents and the district. Factors such as desired educational programs or type of service delivery system cannot override the federal requirement to allocate per pupil amounts to schools in rank order by poverty level.

District Discretion

- In general, a district has limited discretion to depart from eligibility requirements to determine which schools will receive Title I funds:
 - a. A district may determine the school's eligibility according to the percentage of low-income children actually enrolled rather than the population of low-income children in its attendance area. This method can only be used if the percentage of low-income students enrolled in the school is equal to or greater than the percentage of low-income students in the attendance area.
 - b. The district may designate as eligible any school or school attendance area in which at least 35 percent of the children are from low-income families.
 - c. A district may elect to SKIP an eligible building that has a higher percentage of children from low-income families IF the district presents documentation to their DPI Title I consultant that shows all of the following:
 - The school meets the comparability requirements.
 - The school is receiving supplemental funds from other state or local sources that are being spent according to requirements for Schoolwide programs or Targeted Assistance schools.
 - Funds spent from other sources would equal or exceed the amount provided under this part.
 - d. The district may continue to serve a school for one year after it has lost Title I eligibility through the one-year exemption option.
 - e. The district may determine the low-income percentage for a school by calculating the low-income percentage of the appropriate lower-level schools (elementary or middle) that "feed" students into it.
- Districts with an enrollment of less than 1,000 or only one school per grade span are exempt from the normal ranking and serving requirements.

Other Considerations

- The 125 percent rule applies when a district serves any school with less than 35 percent poverty average. The amount of funds given to each building shall be at least a minimum amount in order to ensure that there are enough funds to operate a viable Title I program. The 125 percent is calculated by dividing the district allocation by the total number of poor students in the district. The resulting number is then multiplied by 125 percent. This is the minimum amount that can be allocated per pupil in all schools served. The minimum per-pupil amount should be calculated and applied before the discretionary reservations are taken off the top of the funds available. These calculations are computed automatically within the electronic ESEA Consolidated Application.
- In some cases, a district may reduce amount of funds for a school by the amount of supplemental state or local funds available to the school that serves the same needs as Title I. This must be documented and receive approval from the Title I consultant at DPI.
- If there are not enough funds to apply the minimum per pupil amount to the school at the bottom of the ranking, it may still receive funding. However, it must be enough funding to operate a viable program.

See US Department of Education Guidance at <http://www.ed.gov/programs/titleiparta/wdag.doc>