

GENERATING FUNDS FOR SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Section 1113(c); or *Federal Register*, 7/3/95, §200.28

Under section 1113(c) of Title I, a district must allocate funds to a participating public school attendance area or school on the basis of the total number of children from low-income families, including low-income children attending private schools. Thus, the district, in consultation with the private school officials, must obtain the best available poverty data on private school children who reside in participating attendance areas. Because private school officials may have access to some sources of poverty information not easily accessible to public school officials, it is very important that public and private school officials cooperate in this effort.

Because generation of funds and eligibility of private school children for services are dependent upon residence in a participating public school attendance area, a district must share the results of its selection process with private school officials early in the consultation process. Other information that generally should be provided in the consultation process includes the following data on each participating area: grade span; enrollment; the number of low-income public and private school children residing in the area; and, as soon as available, the per-pupil allocation of each public school participating area.

Collecting Poverty Data on Private School Children

A district may use the following methods to obtain poverty data on private school children.

1. **Data from the same source.** A district may use poverty data from the same source for both public and private school children, e.g., free and reduced-price lunch data.
2. **Comparable data.** A district may use poverty data for private school children that are from a different source than the data it uses for public school children as long as the income level for both sources is generally the same. For example, the district uses free or reduced-price lunch data but private school children do not participate in the free lunch program; however, private school officials are able to provide the district with a count of children who would be eligible for free or reduced-priced lunches using other sources of poverty data such as a survey of parents, Transitional Aid to Families with Dependent Children (TAFDC), or tuition scholarship programs.

Some districts conduct a survey that requests comparable data on the low-income families whose children attend private schools. The only information necessary for the district to include for private school children is: (a) address; (b) grade level of each child; and (c) income level of parents. A district is not required to have the names of the families.

Example:

Surveys yielding good data have some common characteristics. The survey itself is simple and understood by parents, including parents with limited knowledge of English. Letters of explanation are sent to principals and meetings are held with them to explain the necessity and importance of the survey. Principals are encouraged to meet with parents and then to distribute the surveys. After a period of time has lapsed, during which time the surveys should have been received, the principals follow-up with those parents who have not returned them. Parents are assured that the completed individual survey forms will be kept in confidence at the private school.

Example:

One school district finds that sensitive data, such as income level, are most easily collected when the families providing the data believe that their privacy will be protected. For this reason, the district uses only a number system to identify the families and does not require any names on the form. Principals are given a copy of the form, instructed to number the forms, and keep a log. They inform parents that their names will only be rematched to the numbers if they do not return the form (i.e., in order to contact them). Printed at the bottom of the form is "This form has been numbered to protect your privacy. Once we receive the information requested, any correlation of this number to your family's name will be kept in strict confidence."

3. **Extrapolation from a representative sample of actual data.** A district may extrapolate the number of low income private school children from actual data on a representative sample of private school children. The representative sample size should be large enough to conclude reasonably that the poverty estimate is accurate.

An extrapolation example is given below.

EXTRAPOLATION

PUBLIC SCHOOL ATTENDANCE AREAS	NUMBER OF PRIVATE SCHOOL CHILDREN RESIDING IN EACH ATTENDANCE AREA	NUMBER OF PRIVATE SCHOOL CHILDREN ON RETURNED SURVEYS IN EACH ATTENDANCE AREA (POOR AND NON-POOR)	NUMBER OF POOR PRIVATE SCHOOL CHILDREN ON RETURNED SURVEYS IN EACH ATTENDANCE AREA	EXTRAPOLATED NUMBER OF POOR PRIVATE SCHOOL CHILDREN IN EACH ATTENDANCE AREA
1	2	3	4	5
A	150	115	100	130.4
B	20	10	4	8
C	30	20	2	3
D	35	10	5	17.5

Column 5 = Column 2 ÷ Column 3 x Column 4

4. **Correlation of sources of poverty data.** A district may obtain the number of poor private school children by correlating sources of data -- that is, by determining the proportional relationship between two sources of public school data and applying that ratio to a known source of data in the private schools. For example, TAFDC in public schools is to free and reduced-price lunch in public school as TAFDC in private schools is to X (correlated free and reduced-price lunch in private schools).

$$\frac{\text{TAFDC public}}{\text{Free and reduced-price lunch}} = \frac{\text{TAFDC private}}{X}$$

Note:

- **Professional Development Set-Aside:** If the LEA sets aside Title I funds for professional development purposes, an equitable proportion must be used to provide services to private school educators of participating private school Title I students.
- **Parental Involvement:** If the LEA sets aside Title I funds for parental involvement, an equitable proportion must be used to provide services to parents of participating private school Title I students.