



Poverty Measurement Tools for Determining CARES Act Equitable Participation

Poverty data is essential in determining a private school's equitable share of the Elementary and Secondary School Emergency Relief (ESSER) funds.

During the consultation process, the local educational agency (LEA) and private school parent should discuss the method or sources of best available data to determine the number of low-income children attending the private school. With regard to ESSER funding, all schools in the LEA will be considered participating school attendance areas.

There are five poverty measurement tool options for the private school and the LEA. The LEA is the final decision maker on what is most comparable of the options but should take into consideration what is discussed during the consultation process.

Poverty Measurement Tool	Example
<p>The same measure of poverty used to count public school children. This option, if available, provides the most comparable data source.</p>	<p>The LEA and the private school both use the free and reduced price lunch data to determine poverty enrollment numbers for CARES Act Funds equitable participation.</p>
<p>Comparable poverty data from a survey. The private school may survey families and use such data to determine the number of students in families experiencing poverty. The survey must have a comparable threshold of poverty to the poverty measurement tool used by the LEA. The LEA may extrapolate the survey results if data is not available for the whole school. If the LEA extrapolates the survey results to the private school's entire enrollment, the LEA will need to</p>	<p>The LEA receives survey data for 100 out of a total enrollment of 200 students at the private school. The results of those surveys indicate 20 students are in families experiencing poverty (or 20 percent). The LEA could extrapolate that 20 percent to the entire student population of 200 students to determine there are 40 students in the school that are in families experiencing poverty.</p>

<p>gather the private school's enrollment data with the survey data.</p>	
<p>Comparable poverty data from a different source. The LEA may use poverty data for private school students from a source that is different from the measurement tool used by the LEA. The data source must use a comparable threshold of poverty to the measurement tool used by the LEA.</p>	<p>An LEA uses free and reduced-price lunch data, but private school children do not participate in the free and reduced-price lunch program; however, private school officials are able to provide an LEA with a count of children who are from low-income families using other comparable sources of poverty data such as eligibility for means-tested tuition scholarship programs</p>
<p>Proportional Calculation. An LEA may apply their low-income percentage to the number of private school children who attend private schools in the LEA boundaries.</p>	<p>The LEA calculates the percent of poverty of a public school attendance area to be 60 percent. The LEA then applies the poverty percentage of the public school attendance area (the entire LEA) to the number of private school children attending private schools within the LEA's boundaries.</p> <p>If the number of private school children attending private schools within the LEA's boundaries is 50, the LEA would apply the same proportional poverty percentage to those 50 students. So in this case 60% of the 50 students would mean that 30 children would be considered low-income in the proportional calculation for the private school.</p> <p>Using this method will give the same equitable share result as the Total Enrollment method.</p>

Equated Measure. The LEA may use an equated measure of low-income by correlating sources of data—that is, determining the proportional relationship between two sources of data on public school children and applying that same ratio to a known source of data on private school children.

An LEA uses FRPL data, but those data are not available for private school students. However, if TANF data are available, the LEA could determine an equated measure of poor children in private schools based on FRPL data by correlating the two sets of data as follows:

$$\frac{\text{TANF (public)}}{\text{FRPL (public)}} = \frac{\text{TANF (private)}}{\text{FRPL (private) X}}$$

$$\text{FRPL (public) X (private)}$$

In this example, the LEA may then use the equated number of private school children based on FRPL data ("X") as the number of private school children from low-income families.

CARES Act Section 18005 states that, "A local educational agency receiving funds under sections 18002 or 18003 of this title shall provide equitable services in the same manner as provided under section 1117 of the ESEA of 1965 to students and teachers in non-public schools, as determined in consultation with representatives of non-public schools." The options to determine the number of low income students attending private schools in this document comes from the United States Department of Education's Non-Regulatory Guidance for Providing Equitable Services to Eligible Private School Children, Teachers, and Families, October 7, 2019."