

# Using Community Eligibility to Meet Title I Guidelines

In January 2014, the U.S. Department of Education released the guidance, “[The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended](#).” The following is a summary for administrators of the National School Lunch Program (NSLP).

## Definitions

**Title I** funding is financial assistance to local educational agencies (LEAs) and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards. Title I funding is administered by the U.S. Department of Education and the Texas Education Agency.

Each state educational agency (SEA) and LEA that receives funding under Title I must assess and report annually on the extent to which economically disadvantaged students are making progress toward meeting State academic achievement standards in reading or language arts and mathematics.

**Community Eligibility** is a designation enabling schools in high-poverty areas to provide meal service at no charge for all students without requiring household applications. Community Eligibility is intended to reduce the burden at the LEA, school and household levels in processing applications for NSLP. Community Eligibility schools use only “direct certification” data to determine the percentage of students eligible for free meals. The community eligibility provision and the school meals programs are administered by the U.S. Department of Agriculture.

## Intersection of Title I and Community Eligibility

To meet some reporting and accountability requirements, an SEA or LEA must have data on individual economically disadvantaged students. For most LEAs, NSLP data, including Community Eligibility data, may be the best source of information they can use to identify individual economically disadvantaged students.

SEAs and LEAs can use the data in the Community Eligibility reports to show the extent to which economically disadvantaged students are making progress toward meeting the State’s academic achievement standards. Allowing Community Eligibility to be used for Title I assessment and reporting is intended to allow SEAs and LEAs to take advantage of these twin purposes.

Community Eligibility provides approved poverty data for LEAs. Multiple combinations of data can be used as a poverty measure for Title I purposes. For instance NSLP data might include a combination of household application data and direct certification data. LEAs are not required to use NSLP data including CEP for Title I purposes. Second year CEP schools are most likely to use the data for Title I.

## Questions and Answers

If you have specific questions about using CEP to meet Title I guidelines, please contact your LEA's Title I staff, your ESC's Title I representative, or email TEA at [NCLB@tea.state.tx.us](mailto:NCLB@tea.state.tx.us).

Selected Questions and abbreviated Answers from the guidance, "[The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended](#)," follow. LEAs should refer to the complete guidance for detailed information about meeting their Title I responsibilities.

### **9. What are the areas of intersection between Community Eligibility and Title I?**

NSLP data are often used as an indicator of poverty to help carry out Title I programs; therefore, the decision to participate in Community Eligibility could also affect an LEA's poverty data for Title I purposes.

### **10. When using NSLP data as a poverty measure for Title I, which types of NSLP data may be included?**

Different combinations of available NSLP data may be used as a poverty measure for Title I purposes.

### **11. If an LEA includes a Community Eligibility school for the purpose of NSLP, must the LEA use NSLP data (including Community Eligibility) for Title I purposes?**

No.

### **14. May an LEA use Community Eligibility data to allocate Title I funds to school attendance areas and schools?**

Yes.

### **15/16. Has ED previously provided information on within-district Title I allocations?**

Yes. This guidance entitled *Local Educational Agency Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools* (August 2003) is available at: <http://www.ed.gov/programs/titleiparta/wdag.doc>. Community Eligibility does not change that guidance.

### **17. If an LEA wishes to use Community Eligibility data to allocate Title I funds to schools, when would Community Eligibility data first be used to determine a school's eligibility and allocation?**

With respect to within-district Title I allocations, an LEA would likely first use Community Eligibility data for a school that is a second-year Community Eligibility school.

### **19. If an LEA has all Community Eligibility schools, does it need to apply the 1.6 multiplier for Title I ranking and allocation purposes?**

No.

**21. If an LEA chooses to group Community Eligibility schools to determine the reimbursement rate from USDA, does each school in a group then have the same poverty percentage for Title I ranking and allocation purposes?**

No; however, an LEA with an enrollment of at least 1,000 students must rank schools individually for ranking and allocation purposes.

**22. If an LEA has traditionally established a cutoff above which Title I-eligible schools are served, does the LEA have any options if the use of Community Eligibility data increases the number of schools above the cutoff?**

Perhaps the most straightforward option is for an LEA to raise its cutoff point.

**23. May an LEA with one or more Community Eligibility schools conduct its own survey to collect the equivalent of NSLP data from the Community Eligibility schools for Title I within-district allocations?**

Yes; but as noted earlier, one of the purposes of Community Eligibility is to reduce burden.

**26/27. Has ED previously provided guidance on how an LEA allocates Title I funds to provide equitable services to eligible private school students?**

Yes. This information is available in Section A (Consultation) and Section B (Allocating Funds) of *Title I Services to Eligible Private School Children* (Oct. 17, 2003). The document is available at <http://www.ed.gov/programs/titleiparta/psguidance.doc>. Community Eligibility does not change that guidance

**28. If a private school is a Community Eligibility school, does every child in the private school automatically generate Title I funds for equitable services.**

No.