

JULY 1, 2025



ARIZONA DEPARTMENT OF **EDUCATION**

ARIZONA DEPARTMENT OF EDUCATION

ESEA WITHIN DISTRICT ALLOCATION QUICK REFERENCE: RANK
AND SERVE UNDER TITLE I, PART A

ACADEMIC ACHIEVEMENT ESEA CONSOLIDATED PROGRAMS

What the Law Says

Title I, Part A of the Elementary and Secondary Education Act (ESEA) provides federal dollars to schools to help students at risk of not meeting state academic standards. As described in Section 1113(a)(3)(A), when districts have insufficient funds to serve all eligible schools, a district shall serve all schools in rank order where the concentration of children from economically disadvantaged families exceeds 75%. If funds remain after serving all eligible schools that exceed 75%, the district shall rank the remaining schools either by poverty or by grade span, and then by poverty. In 1994, 2001, and 2015, Congress prioritized Title I funding to support high-poverty high schools before serving higher-poverty elementary schools to ensure College and Career Readiness.

All districts receiving Title I-A funds are required to follow rank and serve requirements, **with the exception of districts that enroll fewer than 1,000 students.**¹

What the Law Means

“Rank and Serve” is the process for determining which schools should receive Title I-A funds.

The intent of the law is to concentrate the funds in schools with the highest percentages of children from families experiencing poverty and to provide **sufficient** funds to make a difference in the academic performance of these students. To determine which schools will receive Title I-A funds, each district must put its schools in rank order from highest to lowest concentrations of children from families experiencing poverty. **Schools with a poverty level of 75% or above must be served in rank order, regardless of grade span.**² Districts that meet the abovementioned exception do not have to follow the rank and serve guidelines and can serve any school.

Selecting Measures for Ranking and Serving

Before the rank-and-serve process can begin, districts receiving Title I-A funds must determine the level of poverty at all schools within the district. The Arizona Department of Education (ADE) as determined the common enrollment criteria date as well as the common income eligibility through October 1 data submissions. This data submission is required of all schools in Arizona and meets the requirements under ARS § 15-901. Districts will use the common poverty metric and enrollment data to determine relative percentages of children from economically disadvantaged families residing in their attendance areas³:

1. The number of enrolled students who have passed integrity and the associated income eligibility 1 and 2 counts from Arizona Education Data Standards (AzEDS). This includes all or one of the following:
 - The number of children using Direct Certification
 - The number of children using data from the administration of the National School Lunch Program
 - The number of eligible children using data from the Alternative Eligibility Form

The selected measure is used to determine the number of economically disadvantaged students at district schools and the proportionate share for eligible private schools. Most school districts use free or reduced-price lunch enrollment to determine schools' poverty levels, but with the introduction of the Community Eligibility Provision (CEP), which eliminates the school meal application for individual households, some are exploring other measures. Additionally, Arizona State Statute requires all Arizona

public schools to report accurate data yearly on all enrolled students using AzEDS. This requires schools to sometimes use more than one method to collect data from all students and ensures that CEP schools also meet the intent and requirements annually through regular, accurate data collection and submission to the ADE. Regardless of the method selected, **the district must use the same method from the same point in time** to determine poverty rates, rank schools, and set per-pupil allocations across the district. This point in time is October 1, as reflected in the October 1 data submissions verified through the ADE and AzEDS.

¹ ESEA Section 1113(a)(6)

² ESEA Section 1113(a)(3)(A)(i)

³ ESEA Section 1113(a)(5)

DRAFT

Requirements

The table below outlines the required steps for ranking and serving schools under Title I-A.

Step	Description	Considerations
1	October 1 data will be used to determine poverty in the district and each of its schools.	<ul style="list-style-type: none"> The common measure is consistent, verified, and collected at the same point in time.
2	Determine the amount available to be allocated to schools. <ul style="list-style-type: none"> Begin with the total allocation, then determine the amount of set-asides to be deducted. The amount remaining is the amount available to be allocated to schools. 	Required set-asides include: <ul style="list-style-type: none"> Services to support students experiencing homelessness Parent and Family Engagement (only applies to districts with an allocation of more than \$500,000) Services for Neglected Children (only required for districts that receive Neglected funds) Equitable services for eligible private schools students in private schools that choose to participate in Title I-A
3	Rank order all schools in the district by percentage of poverty.	<ul style="list-style-type: none"> Allocate to schools with over 75% poverty. Schools over 75% must be served in rank order, regardless of grade span.
4	After schools with 75% poverty or above are served, determine whether to rank the remaining schools into grade span groupings or the district as a whole. Districts must consider High School priority and serve before elementary schools if data and the Integrated Action Plan support this action.	<ul style="list-style-type: none"> If a district selects grade span grouping as the method for serving schools, the district can choose to fund grade spans at different Per Pupil Amounts (PPA). NOTE: The PPA amount for a higher poverty school must be more than or equal to that of a lower poverty school within the same grade span.
5	Determine the amount of funding for each school served. <ul style="list-style-type: none"> A district may determine a baseline PPA by dividing the total available Title I funds (after set-asides) by the total number of economically disadvantaged students in the district. 	<ul style="list-style-type: none"> If a school whose poverty rate is below 35% is served, all schools being served must receive a PPA that is equal to or greater than 125% of the PPA the district receives*. This amount can be determined using the following formula: (District allocation / total number of economically disadvantaged students) X 1.25.

* A district can continue to serve any school that falls below 35% poverty **through a one-year extension (Grandfather Clause)**, provided the school was eligible and served in the previous year. This is helpful while schools adjust to October 1 data submissions.

***High School LEAs** have the option to include high schools with a 50% poverty rate in this must-serve group if they choose.

****Served in rank order:** Providing funds for a site via the PPA process. Sites must receive a PPA of the same amount or more than those ranked below.

*****October 1 Counts** through AZEDS serve as a state-determined common poverty metric and a common enrollment eligibility source.

******High School Priority:** In 1994, 2001, and 2015, Congress prioritized Title I funding to support high-poverty high schools before serving higher elementary schools to ensure College and Career Readiness

Questions for Reflection

1. What is our district's current measure for determining poverty? Does it meet the October 1 data submission requirements? Does our district have procedures in place to ensure that data is clean and accurate as of October 1? Do our current rank and serve procedures rank and serve schools accurately, reflect our population, or should a different method be considered?
2. How are we meeting the strengths and needs of students attending schools that our district chooses not to serve with Title I-A funds (e.g., skipped schools, schools below LEA poverty percentage, high schools)?
3. How does the district coordinate and communicate with schools regarding changes to Title I-A budgets (e.g., decreases to school budgets, changes in poverty rates that affect which schools are served)? Does the LEA adhere to procedures for Rank and Serve without making pre-determined decisions on which schools are eligible?

Frequently Asked Questions

1. **Are any schools required to be served?** Yes. Schools with a poverty rate of 75% or higher must be served with Title I-A funds.
2. **What are the requirements for serving charter schools?** Any district-sponsored charter school must be ranked by poverty level, and it must be served if eligible for Title I, Part A. This requirement applies both to existing and newly established charter schools. Additionally, any multi-site charter LEA must be ranked by poverty and meet all other rank-and-serve criteria.
3. **What about schools with no fixed attendance area?** In cases where a district's schools have no fixed attendance area, such as those with a districtwide open enrollment policy or choice program, or in the case of magnet schools that draw from more than one attendance area, ESEA Section 1113(b)(1)(B) allows an LEA to determine a school's eligibility for participation in Title I-A on the basis of the poverty level of children enrolled in the school. This is also outlined through approved charters and is also accounted for in the October 1 data submission requirements.
4. **May a district allocate a greater Per Pupil Allocation (PPA) to schoolwide programs than to targeted assistance programs, since schoolwide programs serve all children?** The Title I statute requires allocations based on the total number of economically disadvantaged children in a school attendance area or school. Therefore, **poverty is the only factor on which a district may determine funding**. In other words, a district may not allocate funds based on the instructional model, educational need, or any other non-poverty factor. Because Title I-A places the responsibility for selecting participants and designing programs on schools rather than on the district, the district will not necessarily be in a position to know in advance the instructional model or educational need when determining allocations.
5. **May a district reserve funds off the top of its Title I-A allocation before allocating funds for equitable services?** No. A district must determine the amount of funds available to provide equitable services before making any expenditure or transferring funds. This includes all reservations for administration, parental involvement, and districtwide initiatives.

Examples of Ranking and Serving Methods

In each of the following examples, the district's **Title I-A Allocation** is \$1,000,000, **Set Asides** are \$100,000, and the **Allocation to Schools** is \$900,000.

Example 1: Rank and Serve by Grade Span

School	Grade Span	Total Enrollment	Poverty Enrollment	Poverty Percentage	Per Pupil Allocation	School Allocation
Saguaro Primary	K-2	200	75	37.5%	\$650.00	\$48,750
Cactus Elem	K-5	350	175	50.0%	\$650.00	113,750
Grand Canyon Elem	K-5	350	100	28.57%	\$0.00	0
Desert Middle	6-8	600	425	70.83%	\$600.00	255,001
Javelina Middle	6-8	650	440	67.69%	\$569.99	250,796
Monsoon High	9-12	1,200	515	42.29%	\$449.91	231,704

\$900,000

Example 2: Rank and Serve by Poverty

School	Grade Span	Total Enrollment	Poverty Enrollment	Poverty Percentage	Per Pupil Allocation	School Allocation
Desert Middle	6-8	600	425	70.83%	\$600.00	255,000
Javelina Middle	6-8	650	440	67.69%	\$575.00	253,000
Cactus Elem	K-5	350	175	50.0%	\$555.00	97,125
Monsoon High	9-12	1,200	515	42.29%	\$500.50	257,757
Grand Canyon Elem	K-5	350	100	28.57%	0	0
Saguaro Primary	K-2	200	75	37.50%	\$494.90	37,118

\$900,000

Example 3: Funding a school below 35% (125% rule)

School	Grade Span	Total Enrollment	Poverty Enrollment	Poverty Percentage	Per Pupil Allocation	School Allocation
Saguaro Primary	K-2	200	75	37.50%	\$809.61	60,721
Cactus Elem	K-5	350	175	50.00%	\$750.00	131,250
Grand Canyon Elem	K-5	350	100	28.57%	\$722.54	72,254
Desert Middle	6-8	600	425	70.83%	\$735.00	312,375
Javelina Middle	6-8	650	440	67.69%	\$735.00	323,400
Monsoon High	9-12	1,200	515	42.29%	\$0.00	0

\$900,000

Calculation Method

1. Determine district PPA **before set-asides** (total allocation divided by # of students in poverty):
\$1,000,000 divided by 1,730 = \$578.03 PPA
2. Determine the new PPA under the 125% rule (district PPA X 125%): \$578.03 X 1.25= \$722.54 per student
3. **Every funded school** must be served at a rate of \$722.54 per student (or above).