The Potential Impact of Revising the Title I Comparability Requirement to Focus on School-Level Expenditures

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The *Elementary and Secondary Education Act of 1965 (ESEA)* requires that school districts provide services to higher-poverty, Title I schools, from state and local funds, that are at least comparable to services in lower-poverty, non-Title I schools. The current Title I comparability requirement allows school districts to demonstrate compliance in various ways and does not require comparability of actual school-level expenditures. New data collected in response to a requirement in the *American Recovery and Reinvestment Act of 2009 (ARRA)* make it possible, for the first time, to conduct a nation-wide analysis comparing school-level expenditures in Title I and non-Title I schools and to examine the potential impact of revising the Title I comparability requirement to focus on school-level expenditures. This policy brief examines the projected number of school districts that would be out of compliance with an expenditures-based comparability requirement under various possible specifications, the amount of funds that such districts might need to add to Title I schools and higher-poverty schools in order to come into compliance, and the amount of additional funds that could flow to low-expenditure schools.

The comparability provision in Title I of *ESEA* requires school districts to provide services in Title I schools from state and local funds that are at least comparable to services in non-Title I schools. Federal assistance provided through Title I is intended to provide additional resources to Title I schools—rather than to compensate for an inequitable distribution of state and local funds that benefits more affluent schools.

Given these requirements, how many districts would be out of compliance and how much funding would districts need to add to Title I and higher-poverty schools if Congress instituted a comparability requirement based on actual school-level expenditures? The new *ARRA* data suggest that there is a significant problem of inequitable resources in Title I and non-Title I schools as well as in higher-poverty and lower-poverty schools; more than 40 percent of Title I schools had lower personnel expenditures than non-Title I schools in the same district. But the simulations conducted for this policy brief also suggest that rectifying those inequities would be less costly than some might think—and could bring a substantial increase in funding for low-spending, high-need schools.

Highlights

- An estimated 18 to 28 percent of Title I districts would not be in compliance with an expenditures-based comparability requirement, depending on the specifications of the requirement.

- On average, the estimated cost of complying with an expenditures-based comparability requirement amounts to just 1 to 4 percent of school-level expenditures in affected districts.

- Low-spending Title I schools and higher-poverty schools would see their per-pupil expenditures rise by an average of 4 to 15 percent.

- Low-spending schools that would benefit from expenditures-based comparability have much higher poverty rates than other schools in their districts.

THE TITLE I COMPARABILITY REQUIREMENT

From its inception, the primary goal of the Title I grant program has been to provide extra resources to help high-poverty schools meet the greater challenges of educating disadvantaged students to reach the same high standards that are expected for all students. To accomplish this goal, Congress added a "comparability of services" requirement to the program shortly after it was created that was intended to ensure that the resources that Title I provides in higher-poverty schools are added on top of an equitable base of state and local resources provided to both Title I and non-Title I schools.

However, because comparability was defined in terms of "services" rather than actual school-level expenditures, the statute has long allowed school districts to demonstrate comparability among Title I and non-Title I schools through a variety of proxies for such expenditures, such as a district-wide salary schedule or student-instructional staff ratios. Moreover, when districts do calculate expenditures per pupil, or instructional salaries per pupil, the current Title I statute specifically prohibits them from taking into account the higher salaries paid to more experienced teachers. Instead, districts typically use average teacher salaries in determining per-pupil expenditures, a practice that in some districts can overstate the resources allocated to high-poverty Title I schools compared to lower-poverty non-Title I schools. This is because the district-wide average salary generally exceeds the salaries actually paid to the novice teachers who are often assigned in larger numbers to high-poverty schools, but is significantly less than the actual salaries received by the more experienced teachers who may be working in a district's low-poverty schools.

In recent years an increasing number of researchers, education advocates, and legislators have highlighted this "loophole" in the current Title I comparability requirement and have called for revising the provision to require comparability of actual school-level expenditures.[1] One obstacle to such a legislative change, or even to analyzing its impact and feasibility, has been the lack of school-level expenditure data that would enable comparisons of actual expenditures in Title I and non-Title I schools within districts across the nation.

DATASET ON SCHOOL-LEVEL EXPENDITURES

Recently, in response to a requirement in *ARRA*, the U.S. Department of Education collected school-level expenditure data for the 2008–09 school year from all states and nearly all Title I school districts. States and districts were asked to report a school-by-school listing showing total personnel expenditures as well as non-personnel expenditures and enrollment for each school, including both Title I and non-Title I schools. This policy brief uses the reported data on personnel and non-personnel expenditures to conduct simulations of the projected impact of an expenditures-based comparability requirement under several different scenarios. The dataset used for this simulation analysis includes the vast majority of schools and districts in the United States—a total of more than 82,000 schools in nearly 13,000 Title I districts.

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[1] D. Hall and N. Ushomirsky (2010), *Close the hidden funding gaps in our schools*, Washington, DC: Education Trust; R. Miller (2010), *Comparable, schmomparable: Evidence of inequity in the allocation of funds for teacher salary within California's public school districts*, Washington, DC: Center for American Progress; L. Luebchow (2009), *Equitable resources in low income schools: Teacher equity and the federal Title I comparability requirement*, Washington, DC: New America Foundation; M. Roza (2008), What if we closed the Title I comparability loophole? In *Ensuring equal opportunity in public education: How local school district funding practices hurt disadvantaged students and what federal policy can do about it,* ed. J. Podesta and C. Brown, 59–71, Washington, DC: Center for American Progress. In addition, the Obama Administration's *Blueprint for Revising the Elementary and Secondary Education Act* called for requiring districts to ensure that high-poverty schools receive state and local funding comparable to expenditure levels in low-poverty schools (U.S. Department of Education, 2010). Legislation introduced in the 112th Congress (*Fiscal Fairness Act,* H.R.1294 and S.701) proposed specific rules for an expenditures-based comparability requirement.

For more information on the study methodology and limitations, see Appendix A of this policy brief and, for more detail, the report from the Study of School-Level Expenditures.[2] The report also contains analyses examining the extent of the resource disparity problem within school districts. For example, the report found that, within districts that had both Title I and non-Title I schools, more than 40 percent of Title I schools had lower personnel expenditures per pupil than did non-Title I schools at the same school grade level. Similarly, the report also found that between 39 to 47 percent of Title I districts had lower per-pupil expenditures in their Title I schools than in their non-Title I schools at the same grade level.

DEFINING AN EXPENDITURES-BASED COMPARABILITY REQUIREMENT

There are at least two possible approaches to defining an expenditures-based comparability requirement. The first is to require that each Title I school must have state and local expenditures per pupil that, at a minimum, are at least equal to the average expenditures for non-Title I schools in the district—or what might be called an "each-to-average" comparison. A second, less stringent approach would be to require that average per-pupil expenditures in Title I schools be at least equal to average expenditures across all non-Title I schools in the district (an "average-to-average" comparison). Either of these two approaches could be modified to use a lower minimum threshold. It is also possible to combine both approaches using a different threshold for each.

This policy brief presents the projected effects of an expenditures-based comparability requirement, based on the 2008–09 school expenditure data, under three different approaches that might be used:

1. Each-to-average comparison using a 100 percent minimum threshold.
2. Average-to-average comparison using a 100 percent minimum threshold.
3. Combination of both approaches using a 100 percent minimum for the average-to-average comparison and a 90 percent minimum for the each-to-average comparison.

Similar to current law, the simulations assume that districts could meet the Title I comparability requirement based on comparisons either across all Title I and non-Title I schools in the district or separately by grade span, and would not be not required to demonstrate comparability if they only have one school per grade span. Finally, there are some districts in which all schools in the district or in a particular grade span are Title I schools. In those cases, the simulations assume that districts would be required to conduct the comparability comparisons between higher-poverty and lower-poverty schools.[3]

ESTIMATED PERCENTAGE OF DISTRICTS OUT OF COMPLIANCE

Finding #1: About one-fifth to one-quarter of Title I districts would be out of compliance.

Simulations based on the 2008–09 school expenditure data suggest that 18 to 28 percent of Title I districts could be out of compliance with an expenditures-based comparability requirement, depending on the specifications of the requirement.

Among the three comparability options examined in this policy brief, the easiest requirement for districts to meet would be the average-to-average comparison, while the most stringent requirement would be the each-to-average comparison using a 100 percent minimum threshold.

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[2] U.S. Department of Education (2011), *Comparability of State and Local Expenditures Among Schools Within Districts: A Report From the Study of School-Level Expenditures*.

[3] For these simulations, we defined school poverty rate as the percentage of students in the school who were eligible for free or reduced-price lunches. "Higher-poverty schools" were defined as those schools whose percentage of free and reduced-price lunch eligible students was above the district average (either overall or for their school grade level).

Of the 12,893 Title I districts in this analysis, a projected 3,655 districts (28 percent) would not meet a requirement for an each-to-average test using a 100 percent minimum threshold, compared with 2,288 districts (18 percent) based on the average-to-average approach and 2,752 districts (21 percent) under the combination approach.[4]

Table 1
**Estimated Number of Districts That Would Be Out of Compliance With an Expenditures-Based
Comparability Requirement, Based on State-Reported School Expenditure Data for 2008–09**

Type of Comparability Approach	Estimated Number of Districts Out of Compliance	Percentage of All Title I Districts
1. Each-to-average comparison; 100% minimum	3,655	28%
2. Average-to-average comparison; 100% minimum	2,288	18%
3. Combination: 100% minimum for average-to-average comparison; 90% minimum for each-to-average comparison	2,752	21%

Districts that did not meet the above comparability tests tended to be larger than districts that passed the tests. For example, based on the each-to-average comparison, districts that did not pass the comparability tests accounted for 64 percent of all schools and 72 percent of all students in the 12,893 districts.

Approximately one in five school districts were not subject to comparability tests because they did not have more than one school per grade span (2,502 of the 12,893 school districts, or 19 percent). However, these very small districts accounted for only 2 percent of all students. In contrast, the 10,391 districts included in comparability tests accounted for 96 percent of all schools and 98 percent of all students in the 12,893 districts.

ESTIMATED COST OF COMPLIANCE

In this section we estimate the amount of money that districts would need to add or shift to low-expenditure schools in order to come into compliance with the potential comparability requirements that are examined in this policy brief. This estimated "cost of compliance" can be calculated in two different ways. The first is a "new-money approach", which is based on computing the amount of funds needed to raise each low-expenditure Title I school to the minimum threshold, based on the current average for non-Title I schools. "New money" does not necessarily mean increased district spending; it could include existing district-level resources that were not previously allocated to the school level.

The second alternative—an "existing-money approach"—is to calculate how much of the district's existing school-level expenditures would need to be shifted between higher-spending and lower-spending schools, without adding any new money to total school-level expenditures. Under this approach, if some resources are reallocated from higher-spending non-Title I schools to lower-spending Title I schools, then the non-Title I average would be reduced, and so would the level to which Title I schools would need to be raised. To estimate the cost of compliance under the existing-money approach, we calculated the amount of funds needed to raise each low-expenditure Title I school to either the district average or non-Title I average, whichever was lower.

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[4] Note that these projections are based on state-reported school expenditure data for the 2008–09 school year and actual results based on current data may differ. Estimates are based on the comparability specifications described above and the dataset described in Appendix A, and alternate approaches could yield different results.

Finding #2: The cost of compliance for most districts would be relatively modest.

> The estimated cost of complying with an expenditures-based comparability requirement amounts to just 1 to 4 percent of total school-level expenditures in affected districts, on average.

Under both the new-money and existing-money approaches, the projected average cost of compliance was similarly low across all three comparability tests examined here. The average cost of compliance was slightly lower under the existing-money approach (1 to 2 percent) and slightly higher under the new-money approach (3 to 4 percent). Among the three options examined here, the average-to-average test had the highest cost under the new-money approach (4 percent) but one of the lowest costs under the existing-money approach (1 percent). It is important to note that these estimates are averages, and that the projected cost of compliance varies between districts and may be higher in specific school districts with larger compliance problems, as discussed below.

Table 2
Estimated Cost of Compliance With an Expenditures-Based Comparability Requirement,
as a Percentage of Total School-Level Expenditures in Affected Districts

Type of Comparability Approach	New-Money Approach	Existing-Money Approach
1. Each-to-average comparison; 100% minimum	3%	2%
2. Average-to-average comparison; 100% minimum	4%	1%
3. Combination: 100% minimum for average-to-average comparison; 90% minimum for each-to-average comparison	3%	1%

Note that this analysis only examined school-level expenditures and did not include district-level expenditures or other district expenditures that were not included in the ARRA school expenditure reporting. Thus, the estimated cost of compliance would be even smaller when considered as a percentage of a district's entire budget.

BENEFITS FOR LOW-SPENDING, HIGH-NEED SCHOOLS

Finding #3: Per-pupil expenditures could rise significantly in low-spending, high-need schools.

> Low-spending Title I and higher-poverty schools could see their per-pupil expenditures rise by an average of 4 to 15 percent, depending on the specific approach used.

Although the total amount of funds that districts would need to shift to low-spending Title I schools and higher-poverty schools is relatively modest, the benefit to those schools could be significant, depending on the approach used. Under all three approaches, if districts choose to meet the comparability test using new money, the average low-expenditure Title I or higher-poverty school could see its funding rise by a projected 14 to 15 percent. However, if districts choose to use existing money, the benefit for low-spending schools would vary more, from an average projected increase of 4 percent under the average-to-average approach to an average of 8 percent under the each-to-average approach.

Why is the estimated benefit for low-spending schools so much higher than the estimated cost of compliance? The answer is that the benefit for low-spending would be targeted to a relatively small subset of schools in these districts—an estimated 15 percent of all schools in non-compliant districts, based on Option 1—while the cost could be spread across the entire district.

Table 3
Estimated Percentage Increase in Per-Pupil Expenditures in Low-Spending
Title I and Higher-Poverty Schools Under an Expenditures-Based Comparability Requirement

Type of Comparability Approach	New-Money Approach	Existing-Money Approach
1. Each-to-average comparison; 100% minimum	14%	8%
2. Average-to-average comparison; 100% minimum	15%	4%
3. Combination: 100% minimum for average-to-average comparison; 90% minimum for each-to-average comparison	15%	6%

Finding #4: Low-spending schools that would benefit from expenditures-based comparability had much higher poverty rates than other schools in their districts.

> **Title I schools that were projected to receive funding increases under an expenditures-based comparability requirement had poverty rates that were twice as high, on average, than the poverty rates of non-Title I schools in the same district.**

For example, based on the each-to-average comparisons with a 100 percent minimum threshold, schools that were below the 100 percent threshold had an average poverty rate of 65 percent, compared with 33 percent for non-Title I schools in those districts.

Looking at individual school districts shows a similar pattern of substantially higher poverty rates in low-expenditure schools. In New York City, for example, Title I schools that were below the 100 percent threshold had an average school poverty rate of 83 percent—roughly two-thirds higher than the average for non-Title I schools in the district (50 percent). In Los Angeles the difference was even greater: Title I schools that were below the 100 percent threshold had an average school poverty rate of 72 percent—more than three times the average for non-Title I schools (22 percent).

VARIATION ACROSS DISTRICTS

Finding #5: Individual districts varied in both the estimated cost of compliance and the potential benefits for low-spending schools.

While the average cost of complying with an expenditures-based comparability requirement is relatively modest, particularly if phased in over time, certain districts would face greater challenges than others. Among districts that do not pass the comparability tests, there was considerable variation in the percentage of schools that fell below the minimum thresholds and the amount of resources that would need to be added to those schools in order to raise them up to the minimum.

> **For example, among a set of 12 large districts that did not pass the 100 percent each-to-average comparability test, the percentage of schools that were below the 100 percent minimum ranged from a low of 2 percent in Wake County, North Carolina, to a high of 72 percent in Houston, Texas.**

For this analysis, we selected 12 large districts by ranking all districts that did not meet the 100 percent each-to-average comparability test by total enrollment and then selecting one district per state—the out-of-compliance district with the largest enrollment in the state—until 12 states were represented.

Four of the 12 districts had fewer than 10 percent of their schools below the district average, while five districts had more than 30 percent of their schools below the district average. The estimated cost of compliance—i.e., the amount of funds that a district would need to add to Title I and higher-poverty schools—varied substantially across districts depending on the calculation method. Under both the new-money approach and the existing-money approach, about half of the districts had an estimated cost that amounted to 1 percent or less of their total school-level expenditures. However, at the top end of the range for the 12 large districts, the highest estimated costs were much higher under the new-money approach (as much as 20 percent, in Houston) than under the existing-money approach (maximum of 7 percent, in Houston).

Similarly, the potential benefit to low-spending, high-need schools also varied across school districts. Among the 12 districts examined here under the 100 percent each-to-average scenario, the average increase in funding for low-spending schools ranged from a low of 4 percent to a high of 29 percent. Looked at another way, the average percentage increase for such schools was 4 to 5 percent in three districts and more than 10 percent in six to seven of the districts. (Similar tables for the other two options are provided in Appendix B.)

Table 4
Estimated Impact of Expenditures-Based Comparability Requirement Based on Option 1
(Requiring That Each Title I School Has State and Local Expenditures Per Pupil That Are At Least
Equal to the Average for Non-Title I Schools in the Same District), in 12 Large Districts

School District	Number of Schools Projected to Receive Funding Increases		Increase for Low-Spending Schools as Percent of Total School-Level Expenditures		Average Percentage Increase in Funding for Low-Spending Schools	
	Number	Percent	New-Money Approach	Existing-Money Approach	New-Money Approach	Existing-Money Approach
National Total	**12,333**	**15%**	**3%**	**2%**	**14%**	**8%**
Chicago, IL	300	53%	9%	5%	14%	11%
Clark County, NV	26	8%	<1%	<1%	13%	13%
Dade County, FL	69	19%	1%	1%	8%	8%
Detroit, MI	87	49%	9%	5%	16%	9%
Gwinnett County, GA	5	5%	<1%	<1%	4%	4%
Houston, TX	190	72%	20%	7%	29%	16%
Los Angeles, CA	141	19%	3%	3%	12%	12%
Memphis, TN	64	34%	4%	4%	11%	11%
Montgomery County, MD	7	4%	<1%	<1%	9%	9%
New York, NY	243	17%	1%	1%	7%	7%
Philadelphia, PA	113	43%	9%	5%	18%	12%
Wake County, NC	3	2%	<1%	<1%	5%	5%

Note: Districts were selected for this table by ranking all districts that did not meet the 100 percent comparability test by total enrollment and then selecting the 12 districts with the largest enrollments, with the condition that no more than one district per state was selected. Hawaii and Puerto Rico are each organized as a single school district and were excluded from this list.

Why do some districts show a much higher projected cost of compliance than other districts? The primary reason is that some districts have more substantial inequities in the level of expenditures provided in Title I schools and non-Title I schools. In addition, there are cases where a school district has a relatively small number of non-Title I schools with very high per-pupil expenditures, which would make the new-money approach more costly than the existing-money approach.

The size of the projected funding increases for under-resourced schools could add significantly to education resources in low-spending, high-need schools. For example, low-spending Title I and higher-poverty schools in Philadelphia would see a projected average increase of 12 percent in their state and local expenditures under the existing money approach, or $445 per pupil for each school (on average).[5] For a typical-sized school of 500 students, this would amount to an additional $222,500, which could be used to add approximately three additional teachers with 5 years of experience[6] or provide additional resources for teacher development, extended learning time, updated materials, new curricular programs, or a variety of other supports for students.

Examples of individual districts that would not pass the 100 percent comparability test illustrate patterns of below-average expenditure levels and above-average poverty rates in schools below the 100 percent threshold.

To illustrate the variation in school expenditure levels in specific school districts that did not pass the 100 percent comparability test applied in this analysis, Table 5 shows the average per-pupil expenditures for schools that fell below the 100 percent threshold compared with non-Title I schools in each district. The table also compares the average school poverty rates for these two groups of schools.

For example, in Chicago, Title I schools that were below the 100 percent threshold had an average school poverty rate of 89 percent—roughly double the average for non-Title I schools in the district (45 percent). Yet, these low-spending Title I schools in Chicago had average per-pupil expenditures that were 13 percent below the average for non-Title I schools ($3,780 vs. $4,329).

Table 5
Per-Pupil Expenditures and School Poverty Rates in 2008–09, in Schools Below the 100 Percent Threshold and in Non-Title I Schools, Based on Option 1 (Comparing Each Title I School to the Non-Title I Average), in 12 Large Districts

School District	Average Per-Pupil Expenditures			Average School Poverty Rate		
	Schools Below 100 Percent Threshold	Non-Title I Schools	Percent Difference	Schools Below 100 Percent Threshold	Non-Title I Schools	Percent Difference
Chicago, IL	$3,780	$4,329	-13%	89%	45%	98%
Clark County, NV	$3,053	$3,443	-11%	74%	32%	131%
Dade County, FL	$2,113	$3,886	-46%	74%	40%	85%
Detroit, MI	$2,911	$3,373	-14%	78%	33%	136%
Gwinnett County, GA	$4,019	$4,184	-4%	79%	34%	132%
Houston, TX	$2,750	$3,606	-24%	67%	19%	253%
Los Angeles, CA	$2,872	$3,329	-14%	72%	22%	227%
Memphis, TN	$3,052	$3,383	-10%	72%	27%	167%
Montgomery County, MD	$5,715	$6,232	-8%	66%	23%	187%
New York, NY	$4,839	$5,238	-8%	83%	50%	66%
Philadelphia, PA	$3,710	$4,632	-20%	77%	45%	71%
Wake County, NC	$3,760	$3,935	-4%	34%	23%	48%

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[5] State and local expenditures for low-spending schools in Philadelphia were $3,710 on average in this dataset; see Table 5.

[6] Estimate is based on average salary for a teacher with five years of experience in Philadelphia ($57,450)—see "Collective Bargaining Agreement between the Philadelphia Federation of Teachers Local 3, American Federation of Teachers AFL-CIO and the School District of Philadelphia," http://www.pft.org/docs/28102_PFT_v6%20-%20Final.pdf. We added 33 percent to this salary figure to approximate the additional cost of teacher benefits. During the 2008–09 school year, public schools spent $213 billion for teacher salaries and an additional $71 billion, or 33 percent, for benefits (National Center for Education Statistics, 2011, *Revenues and Expenditures for Public Elementary and Secondary Education: School Year 2008–09*, Table 9, p. 18).

CONCLUSIONS

Title I of ESEA is intended to help meet the educational needs of at-risk students in the nation's highest-poverty schools by providing additional resources and not to compensate for any lack of comparable services provided through state and local funding. However, if Title I schools do not receive levels of state and local funding that are comparable to those in other schools in the same district, then the federal investment in Title I may not in fact ensure that such schools have the level of resources needed to help address the greater challenges that they face.

This analysis found that a substantial percentage of districts would not meet an expenditures-based comparability requirement, based on the 2008–09 data used for these simulations, but that the cost to eliminate shortfalls in affected Title I and higher-poverty schools would be relatively modest. Raising low-spending Title I and higher-poverty schools up to the average funding levels found in more advantaged schools would help to ensure that Title I funds are supplementing a truly comparable base of state and local resources in our nation's schools and fulfilling the purpose of federal education funding.

APPENDIX A:
DATA SOURCE AND QUALITY

This policy brief is based on data collected by the Study of School-Level Expenditures in response to a requirement under the *American Recovery and Reinvestment Act of 2009 (ARRA)*. All states were required to report school-level expenditures for the 2008–09 school year for all districts that received Title I Part A funds under *ARRA*.   States and districts were asked to provide a school-by-school listing, including both Title I and non-Title I schools, showing four types of expenditures: total personnel salaries for all school-level instructional and support staff; salaries for instructional staff; salaries for teachers; and non-personnel expenditures (if available).

The dataset used for the simulations contained in this policy brief includes 82,442 schools and 12,893 districts, which represent a large majority of public schools and school districts across the nation. According to the NCES Common Core of Data (CCD), in 2008–09 there were 98,706 public schools and 13,809 regular school districts, so the schools and districts included in these simulations account for 84 percent of the total number of CCD schools and 96 percent of CCD districts.

States' original data submissions for the Study of School-Level Expenditures included school expenditure and enrollment data for a total of 90,544 schools in 15,610 districts. Some of these schools and districts were excluded from analyses, either because the district contained no Title I schools and was therefore out of scope for this analysis (3,943 schools and 1,801 districts) or due to data quality concerns (3,608 schools and 584 districts). Among the 3,608 schools that were removed from the analysis due to data quality concerns, 2,106 were in New Jersey and were removed because that state included federal funds in its school expenditure reports, 1,367 were removed because they had very low reported expenditures (less than $1,000 per pupil) that were presumed to be inaccurately reported, and 135 were removed because they had very high reported expenditures (more than $30,000 per pupil). The schools and districts that were removed from the analysis dataset amount to 8 percent of the schools and 15 percent of the districts for which states reported school expenditure and enrollment data. Some of the school districts that were removed were not regular school districts as defined by the CCD. In addition, a small number of schools included in the report from the Study of School-Level Expenditures were not included in the simulation analyses contained in this policy brief because their reported data included only non-personnel expenditures and not personnel expenditures.

States were asked to report school-level expenditures from state and local funds only (i.e., excluding expenditures from federal program funds) and to exclude expenditures for special education, adult education, school nutrition programs, summer school, preschool, and employee benefits. Most states reported that they were able to submit school expenditure data that were consistent with the above specifications, but some states indicated some divergence from these preferred specifications. Consequently, the data collected through this study are not consistently defined across all states and districts, and are best used to examine resource patterns within districts rather than across districts.

Differences between states in the expenditure definitions used for reporting school-level expenditures are likely not a significant problem for the within-district analyses conducted for these simulations. The data reported for non-personnel expenditures show wider variation across districts and states than do the personnel expenditures and appear likely to be defined inconsistently across sites. However, the non-personnel expenditures reported in this data collection comprise a small percentage of total reported school-level expenditures (6 percent). Although the simulation analyses presented in this policy brief are based on the total of personnel plus non-personnel expenditures for each school, we also conducted simulations using just personnel expenditures and the results were similar.

APPENDIX B:
SUPPLEMENTAL TABLES

Table B-1
Estimated Impact of Expenditures-Based Comparability Requirement Based on Option 2
(Requiring That Average State and Local Expenditures Per Pupil in Title I Schools Are At Least
Equal to the District's Average for Non-Title I Schools), in 12 Large Districts

	Number of Schools Projected to Receive Funding Increases		Increase for Low-Spending Schools as Percent of Total School-Level Expenditures		Average Percentage Increase in Funding for Low-Spending Schools	
	Number	Percent	New-Money Approach	Existing-Money Approach	New-Money Approach	Existing-Money Approach
National Total	**6,482**	**15%**	**4%**	**1%**	**15%**	**4%**
Chicago, IL	213	38%	6%	<1%	10%	2%
Clark County, NV	PASS	PASS	PASS	PASS	PASS	PASS
Dade County, FL	PASS	PASS	PASS	PASS	PASS	PASS
Detroit, MI	20	11%	5%	<1%	20%	<1%
Gwinnett County, GA	PASS	PASS	PASS	PASS	PASS	PASS
Houston, TX	129	49%	18%	<1%	27%	3%
Los Angeles, CA	PASS	PASS	PASS	PASS	PASS	PASS
Memphis, TN	PASS	PASS	PASS	PASS	PASS	PASS
Montgomery County, MD	PASS	PASS	PASS	PASS	PASS	PASS
New York, NY	PASS	PASS	PASS	PASS	PASS	PASS
Philadelphia, PA	124	47%	8%	<1%	16%	<1%
Wake County, NC	PASS	PASS	PASS	PASS	PASS	PASS

Table B-2
Estimated Impact of Expenditures-Based Comparability Requirement Based on Option 3
(Requiring That Each Title I School Has State and Local Expenditures Per Pupil That Are At Least 90 Percent of the
District's Average for Non-Title I Schools and That Average State and Local Expenditures Per Pupil in Title I Schools
Are At Least Equal to the District's Average for Non-Title I Schools), in 12 Large Districts

	Number of Schools Projected to Receive Funding Increases		Increase for Low-Spending Schools as Percent of Total School-Level Expenditures		Average Percentage Increase in Funding for Low-Spending Schools	
	Number	Percent	New-Money Approach	Existing-Money Approach	New-Money Approach	Existing-Money Approach
National Total	**6,751**	**17%**	**3%**	**1%**	**15%**	**6%**
Chicago, IL	110	19%	6%	1%	10%	4%
Clark County, NV	16	5%	<1%	<1%	11%	2%
Dade County, FL	25	7%	<1%	<1%	5%	5%
Detroit, MI	23	13%	6%	1%	17%	7%
Gwinnett County, GA	PASS	PASS	PASS	PASS	PASS	PASS
Houston, TX	95	36%	18%	4%	27%	12%
Los Angeles, CA	53	7%	<1%	<1%	7%	7%
Memphis, TN	29	16%	1%	1%	10%	8%
Montgomery County, MD	2	1%	<1%	<1%	2%	2%
New York, NY	50	4%	<1%	<1%	4%	4%
Philadelphia, PA	72	27%	8%	2%	16%	7%
Wake County, NC	PASS	PASS	PASS	PASS	PASS	PASS