TITLE I, PART A HANDBOOK
For 2006-07

Division of Federal Programs and Instructional Equity

(502) 564-3791

Kentucky Department of Education

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PURPOSE OF TITLE I, PART A HANDBOOK

The technical assistance documents in the *Title I, Part A Handbook* are intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (USDOE) policy guidance that may be found at <**http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.** The following policy guidance documents referred to in the handbook are currently available. The U.S. Department of Education will place others on their website as they become available.

1. *Improving Teacher Quality Guidance* – (for Title II state grant programs) focuses on preparing, training, and recruiting high quality teachers and principals.
2. *Identifying Eligible Title I Schools and Attendance Areas* – outlines how districts identify eligible Title I schools and allocate funds to those schools.
3. *LEA and School Improvement Guidance* – provides overview of district and school improvement under Title I, Part A of the *Elementary and Secondary Education Act* (ESEA), as reauthorized under the *No Child Left Behind Act* (NCLB).
4. *Parental Involvement* – assists states, districts and schools in administering the parental involvement provisions of Title I, Part A of the ESEA.
5. *Public School Choice* – highlights key aspects of the public school choice component (option to transfer) of Title I and offers gui9dance that may be useful in implementing the requirements.
6. *Serving Preschool Children under Title I* – provides the rationale for using Title I funds for preschool services, identifies the components of a quality program, and addresses many administrative issues.
7. *Supplemental Educational Services* – provides information of additional academic instruction designed to increase the academic achievement of students in Title I schools that have not made adequate yearly progress for 3 years.
8. *Schoolwide Programs* – provides information on effectively implementing the 10 components of a schoolwide program.
9. *Title I Paraprofessionals Guidance* – provides questions and answers on requirements for and assessment of paraeducators.
10. *Title I Services to Private School Children* – addresses a district's responsibilities in making sure that eligible private school children receive equitable services under Title I, Part A of ESEA.
11. *Equitable Services for Private Schools* – assists districts to provide equitable services to eligible private school students, teachers, other educational personnel, and parents.
12. *Title I Fiscal Issues* – provides guidance on comparability, supplement/not supplant, etc.
13. *Transferability Authority* – provides guidance on the use of this flexibility authority to transfer program funding to meet needs.

The technical assistance documents in the handbook are based on the USDOE policy guidance and the *No Child Left Behind Act*. The particular sections of the NCLB legislation are referenced in the title of each document. The NCLB legislation and the NCLB regulations are available on the USDOE website at <http://www.ed.gov/about/offices/list/oese/legislation.html>.

Use the technical assistance documents in the handbook, the policy guidance, the legislation, and the regulations in planning and implementing the many aspects of Title I, Part A to maximize services to disadvantaged children. If you have questions or want to discuss any aspect of Title I, Part A, please call the Title I program staff at (502) 564-3791: Jennifer Baker, Claude Christian, Debbie Hicks, Jaynae Laine, Charliese Lewis, Mary Marshall, Dawn Offutt, Diane Robertson, Robert Simpson, Joe Whitworth.

REVISIONS/ ADDITIONS TO TITLE I HANDBOOK

The following are revisions/ additions to the Title I Handbook for 2006-07:

1. **CALENDAR FOR 2006-07** – An overall timeline has been added to the handbook to assist districts.
2. **TITLE I SCHOOL IMPROVEMENT** – The information has been revised to clarify the requirements for parent notification and school choice.
3. **TITLE I DISTRICT IMPROVEMENT** – The information has been separated from school improvement, and information has been added about corrective action to be taken by the Kentucky Department of Education toward Tier 3 districts.
4. **PARENT INVOLVEMENT** – A resource list and examples from the Prichard Committee Parent Involvement Toolkit have been added.
5. **PARTICIPATION BY PRIVATE SCHOOL CHILDREN AND TEACHERS** – Sections on the requirements for consultation with private school officials and complaint process have been added.
6. **SCHOOLWIDE PROGRAMS** – Reference to U.S. Department of Education guidance on SWP has been added to the SWP part.
7. **DISTRICT PLANNING – (New)** Information has been added to the handbook on changes in district planning.
8. **COMPLAINT PROCEDURE – (New)** Information has been added to the handbook on a procedure for the receipt and resolution of complaints alleging violations of Title I, part A in the administration of the program.
9. **FISCAL REQUIREMENTS –** Examples of supplanting have been added to the Fiscal Requirements part.
10. **PROCUREMENT, INVENTORY, AND DISPOSITION OF EQUIPMENT – (New)** Information has been added to the handbook on using KDE Property Procedures and the MUNIS Fixed Asset Module.

TITLE I CALENDAR FOR 2006-07

SWP & TAS Planning for 2006-07 – schools plan program in consultation with Title I coordinator • Review of data and improvement plan • Completion of SWP/TAS report	• Throughout 2006-07school year • April – May 2006 – complete and keep on file at school and district office
Title I Ranking Report for 2006-07 – determine schools served by Title I and allocations and submit	• March 2006 – available on KDE web site • August 15, 2006 – due to KDE
MUNIS Program Budget Reports – to report expenditures	Quarterly – electronically to KDE • July 1 - September 30 – due October 25 • October 1 - December 31 – due January 25 • January 1 - March 31 – due April 25 • April 1 - June 30 – due July 25
Schools Identified for Title I Improvement – implement requirements for identified schools based on 2006 report • Project which schools may be identified • Notification to parents • Revision of school improvement plan • Peer review and approval of school plan • Reservation & expenditure – 10% for PD • Implementation of corrective action or restructuring plan	• Spring and Summer 2006 • August 2006 (before school starts) • November 2006 (3 months after identification) • December 2006 (45 days after revision) • August 2006 – August 2007 (district may set 12-month timeline for expenditures) • ASAP to have impact on achievement
Districts Identified for Title I Improvement – implement requirements for identified districts based on 2006 report • Notification to parents • Revision of district improvement plan; Tier 3 districts will submit plans to KDE • Reservation & expenditure – 10% for PD • (State) implementation of corrective action	• August 2006 • November 2006 (3 months after identification) • August 2006 – August 2007 (district may set 12-month timeline for expenditures) • ASAP to have impact on achievement
Services to Private School Students – consult with officials and provide equitable Title I services to eligible students, their parents, and their teachers • Determination if school wants to participate • Consultation with school officials • Services to eligible Title I students • Evaluation of services	• Spring 2006 • Spring 2006 and throughout 2006-07 • First day of school for students • Spring of each year (to plan for next year)
Parent Involvement – communicate with/involve parents in schoolwide program or targeted assistance school • Annual meeting • School-home compacts • Annual parent evaluation • Review of district parent involvement policy • Review of school parent involvement policy	• Fall • Fall • Spring • Fall or spring (after evaluation) • Fall or spring (after evaluation)
Transfer Amendment – submit transfer of funds from applicable programs to applicable programs	• No window – to KDE at least 30 days prior to transfer
15% Carryover Limitation – districts with Title I allocations of $50,000 or more, carryover is limited to not more than 15% of the district's allocation	• September 30, 2006
Comparability – determine if Title I schools are receiving comparable share of state/local funds	• November 2006 – due to KDE

GLOSSARY

NCLB, Title I, Part A and Title IX, Section 9101

GLOSSARY

NCLB, Title I, Part A and Title IX, Section 9101

Core Academic Subjects – English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography

Distance Learning – the transmission of educational or instructional programming to geographically dispersed individual and groups via telecommunications

Family Literacy Services – services provided to participants on a voluntary basis that are of sufficient intensity in terms of hours, and of sufficient duration, to make sustainable changes in a family, and that integrate all of the following activities:

- Interactive literacy activities between parents and their children.
- Training for parents regarding how to be the primary teacher for their children and full partners in the education of their children.
- Parent literacy training that leads to economic self-sufficiency.
- An age-appropriate education to prepare children for success in school and life experiences.

High Poverty School – school in the top quartile of poverty (75% or above)

Highly Qualified –

The teacher –

- Holds at least a bachelor's degree;
- Holds full Kentucky certification (emergency, probationary and adjunct instructor certifications are not full Kentucky certifications); **AND**
- Demonstrates competency in each of the core academic subjects taught.

The paraeducator –

- Has completed at least 2 years of study at an institution of higher education;
- Obtained and associate's (or higher) degree; **or**
- Met a rigorous standard of quality and can demonstrate, through a formal State or local academic assessment, knowledge of and the ability to assist in instructing in reading, writing, and mathematics.

High, Objective, Uniform State Standard of Evaluation (HOUSSE) – NCLB allows states to develop an additional way for current teachers to demonstrate subject-matter competency and meet highly qualified teacher requirements. Proof may consist of a combination of teaching experience, professional development, and knowledge in the subject garnered over time in the profession.

Limited English Proficient – the term limited English proficient, when used with respect to an individual, means an individual:

- Who is aged 3 through 21; who is enrolled or preparing to enroll in an elementary school or secondary school; who was not born in the United States or whose native language is a language other than English; who is a Native American or Alaska Native, or a native resident of the outlying areas; and
- Who comes from an environment where a language other than English has had a significant impact on the individual's level of English language proficiency; or who is migratory, whose native language is a language other than English, and who comes from an environment where a language other than English is dominant; and
- Whose difficulties in speaking, reading, writing, or understanding the English language may be sufficient to deny the individual the ability to meet the state's proficient level of

achievement on State assessments; the ability to successfully achieve in classrooms where the language of instruction is English; or the opportunity to participate fully in society.

Local Educational Agency (LEA) – a public board of education or other public authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a state, or of or for a combination of school districts or counties that is recognized in a state as an administrative agency for its public elementary schools or secondary schools. In short, an LEA is a school district.

Paraprofessional/Paraeducator – a classified employee, under the direct supervision of a teacher. The paraeducator may be assigned to:

- Provide one-on-one tutoring for eligible students, if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher
- Assist with classroom management, such as organizing instructional and other materials
- Provide assistance in a computer laboratory
- Conduct parental involvement activities
- Provide support in a library or media center
- Act as a translator
- Provide instructional services to students under the direct supervision of a highly qualified teacher

Parental Involvement – the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, that includes ensuring:

- Parents play an integral role in assisting their child's learning;
- Parents are encouraged to be actively involved in their child's education at school;
- Parents are full partners in their child's education and are included, as appropriate, in decision-making and on advisory committees to assist in the education of their child;
- The carrying out of other parent involvement activities.

Professional Development – includes, but is not limited to, activities that:

- Improve and increase teachers' knowledge of academic subjects and enable teachers to become highly qualified;
- Are an integral part of broad schoolwide and districtwide educational improvement plans;
- Give teachers and principals the knowledge and skills to help students meet challenging State academic standards;
- Improve classroom management skills;
- Are sustained, intensive, and classroom-focused and are not one-day or short-term workshops;
- Advance teacher understanding of effective instruction strategies that are based on scientifically based research; and
- Are developed with extensive participation of teachers, principals, parents, and administrators.

School Attendance Area – the geographic area in which the children who are normally served by that school reside.

Scientifically Based Research – research that:

- Involves the application of rigorous, systematic, and objective procedures to obtain reliable and valid knowledge relevant to education activities and programs

- Employs systematic, empirical methods that draw on observation or experiment; involves rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn
- Relies on measurements or observational methods that provide reliable and valid data across evaluators and observers, across multiple measurements and observations, and across studies by the same or different investigators
- Is evaluated using experimental or quasi-experimental designs in which individuals, entities, programs, or activities are assigned to different conditions and with appropriate controls to evaluate the effects of the condition of interest, with a preference for random-assignment experiments, or other designs to the extent that those designs contain within-condition or across-condition controls; ensures that experimental studies are presented in sufficient detail and clarity to allow for replication or, at a minimum, offer the opportunity to build systematically on their findings
- Has been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous, objective, and scientific review

State Educational Agency (SEA) – The term state educational agency means the agency primarily responsible for the State supervision of public elementary schools and secondary schools (Kentucky Department of Education).

TITLE I, PART A
PROGRAM REQUIREMENTS

NCLB, Title I, Part A

TITLE I, PART A, PROGRAM REQUIREMENTS

NCLB, Title I, Part A

Purpose of Title I, Part A: Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind (NCLB) Act, is designed to help disadvantaged children reach high academic standards. The following requirements in the *No Child Left Behind Act* (NCLB) apply to districts receiving Title I, Part A funds.

DISTRICT REQUIREMENTS

1. **School Attendance Areas:** A district must rank order all of its school attendance areas based on the percent of low-income children. The district must serve, in rank order of poverty, its schools above 75 percent poverty. Then the district has the option to (a) continue on with the district-wide ranking or (b) rank remaining schools by grade span grouping.
2. **Allocations:** A district must allocate Title I, Part A funds to participating schools based on Title I, Part A allocation procedures. Districts serving any school below 35% low-income must allocate Title I, Part A funds to participating schools based on a minimum per pupil amount using the 125% rule.
3. **Children from Local Institutions for Neglected Children:** A district must set aside funds for the special educational needs of children in local institutions for neglected children. Funds for service to the institution should be put in the district set-aside before funds are allocated to schools.
4. **Homeless Children:** Districts must provide services for homeless children who do not attend participating Title I schools, including providing educationally related support services to children in shelters. The services must be comparable to those provided to children in Title I schools. A district must set aside funds (regardless of receiving a McKinney-Vento Homeless Assistance Grant) for homeless children attending schools not served by Title I.
5. **Private School Children:** A district must provide eligible private school children, their families and teachers with Title I, Part A educational services that are equitable to those provided to eligible public school children, their families and teachers. These services must be determined in consultation with private school officials.
6. **Preschool Programs:** Preschool programs supported by Title I, Part A funds must comply with Head Start performance standards unless the preschool program is based on the Even Start model.
7. **Parent Involvement:** A district with an allocation over $500,000 must reserve and spend at least 1% of its allocation in the district set-asides for parent involvement activities and must distribute 95% of that 1% to Title I schools. A proportionate amount of the 95% must be used for parent involvement for parents of participating private school students. A written parent involvement policy at the district level must be developed jointly, agreed upon, and distributed to parents of participating children. The parent involvement policy must include:
   - Overall expectations for parent involvement;
   - Components for building capacity for more effective parent involvement; and
   - An annual evaluation of the content and effectiveness of the parent involvement activities in increasing participation of parents and whether there are barriers to greater participation.
8. **Highly Qualified Teachers:** Districts that receive Title I, Part A funds must ensure that teachers meet the NCLB definition of “highly qualified.” The Education Professional Standards Board (EPSB) is the agency that has the responsibility for the final determination

on issues relating to whether a person is "highly qualified." For that reason, it is essential that answers to specific questions from district personnel be answered by EPSB. Please refer all inquiries to Dr. Phillip Rogers. He may be reached by email at Phillip.Rogers@ky.gov>. The phone number is (502) 564-4606 or (888) 598-7667. The following must be ensured by districts:

- Teachers hired after the first day of the 2002-03 school year who teach core academic subjects in a program supported with Title I, Part A funds are highly qualified. In a schoolwide program, the requirement applies to all teachers who teach core academic subjects. In a targeted assistance school, the requirement applies to teachers funded from Title I, Part A that teach in core academic subjects. The requirement also applies to teachers who are employees of the district and are hired to provide services to eligible private school students. Core academic subjects are English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, history, geography, and arts.
- **All** teachers (including special education teachers) who teach core academic subjects are highly qualified by the end of the 2006-07 school year. The requirement applies to **all** teachers in all elementary and secondary schools, regardless of funding. Core academic subjects are English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, history, geography, and arts.

9. **Parents Right to Request:** Local school districts must annually notify parents of their right to request information on the professional qualifications of their children's teachers.

10. **Paraeducators:** Districts must ensure that all paraeducators in a program supported with Title I funds meet one of the following requirements by the end of the 2005-06 school year:
    - Completed at least 2 years of study at an institution of higher education;
    - Obtained an associate's (or higher) degree; or
    - Met a rigorous standard through the Kentucky Paraeducator's Assessment or an assessment that meets the required criteria.

11. **Professional Development:**
    - **Highly Qualified Staff** – The district must use Title I, Part A funds for professional development activities to ensure that teachers and paraeducators in programs supported with Title I funds meet the requirement of becoming "highly qualified." Not less than 5% of the district's Title I, Part A allocation per year is required. The district is not required to set-aside and spend the total 5% if the district documents that a lesser amount is sufficient to ensure that the teachers and paraprofessional meet the definition of "highly qualified."
    - **District Improvement** – If the district does not make adequate yearly progress (AYP) for two consecutive years or more, the district must reserve and spend at least 10% of its Title I, Part A allocation for professional development for instructional staff across the district that is specifically designed to improve classroom teaching. The district must continue to reserve and use these funds for professional development for each fiscal year it is identified for improvement. The district is identified for improvement until it has made AYP for two consecutive years.

12. **School Improvement:** Districts must meet Title I, Part A school improvement requirements for Title I schools not making adequate yearly progress. The district's obligation for transfer-related transportation and supplemental educational services is equal to 20 percent of its district Title I, Part A allocation unless the district documents that a lesser amount is needed. The funds may come from other sources. Within the 20%, a district must spend
    - An amount equal to 5 percent for transfer-related transportation;
    - An amount equal to 5 percent for supplemental education services for low-income students only; and

- An amount equal to 10 percent for transportation or supplemental education services, or both as the district determines.

13. **Option to Transfer and Supplemental Educational Services:** Districts must annually notify parents of all students attending schools identified for improvement, corrective action, or restructuring (Tier 1, Tier 2, Tier 3, Tier 4, Tier 5) of their option to transfer their child to another public school. District must annually notify parents of eligible students attending schools identified for improvement, corrective action, or restructuring (Tier 1, Tier 2, Tier 3, Tier 4, Tier 5) of their option to transfer or to obtain supplemental educational services.
14. **Maintenance of Fiscal Effort:** A district may receive Title I, Part A funds for any fiscal year only if either its combined fiscal effort per student or the aggregate expenditures of the district and the state with respect to the provision of free public education by the district for the preceding fiscal year is not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.
15. **Comparability:** A district must meet the comparability requirement as follows: A district may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I, Part A schools that are at least comparable to the services provided in schools that are not receiving Title I, Part A funds.
16. **Supplement versus Supplant:** A district may use Title I, Part A funds only to supplement the funds that would, in the absence of Title I, Part A funds, be made available from non-Federal sources for the education of children participating in Title I, Part A programs. In no case may Title I, Part A funds be used to supplant, take the place of, funds from non-Federal sources.
17. **Carryover Funds:** For districts with Title I, Part A allocations of $50,000 or more, carryover funds on September 30 are limited to no more than 15%. A state education agency (SEA) may grant a one-time waiver of the percentage limitation during a three-year period upon written request of a district if it determines the request is reasonable and necessary or if supplemental appropriations become available.
18. **Transferability of Funds:** A district may transfer up to 50 percent of funds from other Federal programs (Title II, Part A; Title II, Part D; Title IV, Part A and Title V, Part A) into Title I, Part A. A district may **not** transfer Title I, Part A funds into other Federal programs. A district that has been identified for improvement may transfer up to 30 percent of funds from other Federal programs into Title I, Part A. When a district is identified for improvement, all transferred funds must be used for district improvement activities. The district must submit a Transfer Amendment to the Division of Budgets in the Kentucky Department of Education. Transfer Amendments must be received at least 30 days prior to the transfer. The total of the Title I allocation + (plus) the amount transferred from other Title programs must be used:
    - To calculate the minimum per pupil amount for districts subject to the 125%;
    - To determine required percentages in district set-asides; and
    - To determine the allocations to public schools served by Title I and to determine the private school program allocation to serve eligible private school children.
19. **Records:** Records must be maintained at both the school and district level for the current year and three (3) prior years.

SCHOOLWIDE PROGRAM REQUIREMENTS

NCLB, Title I, Part A, Sections 1114 and 1119

Definition: A school with at least 40% low-income is eligible to plan and implement a schoolwide program (SWP). A schoolwide program must upgrade the entire educational program in the school in order to raise academic achievement for all the students. A schoolwide program:

- Is based on a year of planning and is built on schoolwide reform strategies, rather than on separate add-on services.
- Provides flexibility in spending Federal, State, and local funds as long as the school engages in strategies that increase the amount and quality of learning time and help provide a high-quality curriculum for all children, according to a comprehensive school improvement plan to help children meet Kentucky's standards.
- Focuses on results. The flexibility in the use of funds must result in increased achievement by subgroup populations (economically disadvantaged, racial and ethnic groups, students with disabilities and students with limited English proficiency).

School Allocation: The district must allocate funds to school attendance areas identified as eligible and selected to participate in rank order based on the percent of low-income students. The school allocation is determined by a per pupil amount times the total number of children from low-income families in each school. Funds are allocated for use by the school, but it remains the responsibility of the district to ensure compliance of school expenditures.

Eligible Children: The school is not required to identify particular children. All children are to be provided the opportunity to meet the academic expectations. The focus is on the instructional program instead of particular children.

Needs Assessment: As a part of comprehensive school improvement planning, the school conducts a needs assessment of all children in the school based on their performance toward meeting the academic expectations. The needs assessment should identify priority needs in student performance in core areas of English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography. The priority needs identified must determine how resources are used.

Components of Schoolwide Program: Title I, Part A does not have to pay for the 10 components in a schoolwide program, but a school with a schoolwide program must include these components in its school. The schoolwide program must:

1. Be based on a comprehensive needs assessment of the entire school that is based on information on the performance of children in relation to the state content and student performance standards.
2. Engage in schoolwide reform strategies that:
   - Provide opportunities for all children to meet Kentucky's proficient and distinguished levels of student performance;
   - Are based on effective means of improving children's achievement that strengthen the core academic program;
   - Use effective instructional strategies that are based on scientific research that increase the amount and quality of learning time (such as extended school year, before- and After-school and summer programs); help provide an enriched and accelerated curriculum; and meet the educational needs of historically underserved populations;
   - Address the needs of all children in the school, but particularly the needs of subgroup

populations and determine how these needs are met. Programs may include counseling; pupil services; mentoring; college and career awareness and preparation; and integration of vocational and technical education programs.

3. Provide instruction by highly qualified professional staff.
4. Provide for high quality and on-going professional development for teachers and paraeducators, parents, principals, and other staff to enable all children in the schoolwide program to meet the state's student performance standards.
5. Include strategies to attract high-quality highly qualified teachers to high-need schools.
6. Include strategies to increase parent involvement such as family literacy services.
7. Use strategies for assisting children in transition from early childhood programs to public elementary schools.
8. Include teachers in the decisions regarding the use of assessments to provide information on and to improve the achievement of individual students.
9. Ensure that students who experience difficulty mastering any of Kentucky's standards will be provided with effective, timely additional assistance.
10. Coordinate and integrate Federal, State, and local services.

Schoolwide Plan: During a one-year period (in consultation with the district, SBDM council, parents, staff and other members of the community) the school must include the following in the Comprehensive School Improvement Plan or in the Schoolwide Program Component Report:

- How the school will implement the ten components;
- How resources will be used to implement the components;
- A list of programs to be used; and
- How the school will provide parents with individual student assessment results in a language the parents can understand.

The Comprehensive School Improvement Plan must be:

- Effective for the duration of the school's participation as a schoolwide program;
- Reviewed and revised as necessary; and
- Available to the district, parents, and public.

Teachers in a Schoolwide Program: The focus of a schoolwide program is to raise the performance level of all students by improving the overall instructional program in the school through the integration of federal, state and local funds. Each Title I school must provide each parent timely notice that the parent's child has been assigned, or has been taught for four or more consecutive weeks by, a teacher of a core academic subject who does not meet the qualification requirements. Each year the principal of a Title I school must certify in writing that the school is complying with NCLB's mandate for highly qualified teachers. Regardless of funding, **all** teachers

- Must meet the *No Child Left Behind* (NCLB) definition of "highly qualified;" (All teachers hired in a schoolwide program after the first day of the 2002-03 school year who teach core academic subjects must be highly qualified. All teachers who teach core academic subjects (including special education teachers) must be highly qualified by the end of the 2006-07 school year.
- Must address identified needs through the comprehensive needs assessment; and
- Assist the school in increasing the effectiveness of the staff, parents, community and agencies in improving the school's performance.

Paraeducators in a Schoolwide Program: In a schoolwide program, paraeducators may be used to assist with instruction to students. NCLB requirements apply to all paraeducators with instructional duties in a schoolwide program. Regardless of funding, the district and school must ensure that by the end of the 2005-06 school year **all** paraeducators with instructional duties

- Have completed at least 2 years of study at an institute of higher education; obtained an associate's degree; or met a rigorous standard through Kentucky's Paraeducator Assessment or an assessment that meets the required criteria.
- Are included in professional development activities.
- Are under the direct supervision of a teacher who has primary responsibility for providing instructional services. The following is considered to be direct supervision of a teacher.
  - The teacher prepares the lessons and plans the instructional support activities the paraeducator carries out and evaluates the achievement of the students with whom the paraeducator is working; and
  - The paraeducator works in close and frequent proximity with the teacher.
- Are **not** pulled to be a substitute teacher in a classroom as the paraeducators would not be under the direct supervision of a teacher.

A program where a paraeducator provides instructional support and a teacher visits a site once or twice a week but otherwise is not in the classroom would be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher. A program where a paraeducator works with a group of students in another location while the teacher provides instruction to the rest of the class would also be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher.

Because paraeducators provide instructional support, they should **not** be providing planned direct instruction or introducing to students new skills, concepts or academic content. Paraeducators working in a schoolwide program may:

- Participate in general professional development and school planning activities;
- Provide one-on-one tutoring at a time when a student would not otherwise receive instruction from a teacher;
- Provide assistance in a computer lab;
- Conduct parent involvement activities;
- Act as a translator; or
- Provide instructional services to students under the direct supervision of a teacher.

Non-instructional Duties: A paraeducator in a program supported with Title I funds may assume limited non-instructional duties that are assigned to instructional staff in a program not supported with Title I funds as long as the amount of time spent on the limited duties is the same proportion of total work time as that of instructional staff at the same school. In a schoolwide program, all paraeducators with instructional duties work in a program supported with Title I funds.

Parent Involvement: A written parent involvement policy at the school level must be developed jointly with, agreed upon with, and distributed to all parents. The parent involvement policy must include:

- Expectations for parent involvement;
- Components for building capacity for more effective parent involvement;
- School-parent compacts, outlining shared responsibilities for high student performance;
- Annual evaluation of the content and effectiveness of the parent involvement activities in increasing participation of parents and whether there are barriers to greater participation.

SWP REQ

Evaluation and School Improvement: Title I, Part A public schools are identified for Title I school improvement if they fail to make adequate yearly progress for 2 consecutive years. Each school identified for Title I improvement must make the necessary revisions in its Comprehensive School Improvement Plan in ways that have the greatest likelihood of improving the performance of participating children in meeting the state's student performance standards. The revised plan should be implemented immediately following such identification. A school that is identified for improvement must reserve and spend at least 10% of its Title I, Part A allocation for each fiscal year that the school is in improvement for professional development.

Supplement versus Supplant: Records must be maintained that document that Title I, Part A funds are used to supplement State and local funds. In a schoolwide program, Title I, Part A funds:

- Must be used to increase the level of funds that would, in the absence of Title I, Part A funds, be made available from non-Federal sources for the education of children in the school;
- Cannot be used to supplant**,** take the place of, funds from non-Federal sources; and
- Cannot be used to meet state requirements.

TARGETED ASSISTANCE SCHOOL REQUIREMENTS

NCLB, Title I, Part A, Sections 1115 and 1119

Definition: A targeted assistance school (TAS) must use funds only for programs that provide supplemental services for Title I identified children. The goal of a targeted assistance school is to improve teaching and learning to enable Title I, Part A participants to meet the academic standards that all children are expected to master.

School Allocation: The district must allocate funds to school attendance areas identified as eligible and selected to participate in rank order based on the percent of low-income students. The school allocation is determined by a per pupil amount times the total number of children from low-income families in each school. Funds are allocated for use by the school, but it remains the responsibility of the district to ensure compliance of school expenditures.

Eligible Children: The school identifies children who are failing or most at risk of failing to meet Kentucky's challenging academic standards and having the greatest academic need. Children who are economically disadvantaged, children with disabilities, migrant children, homeless children, and limited English proficient children are eligible for Title I, Part A services on the same basis as other children that are selected for services. From the list of eligible children, the school selects those children who have the greatest need for special assistance to receive Title I, Part A services in the identified focus areas. Core academic areas include English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography.

Needs Assessment: As a part of comprehensive school improvement planning, the school conducts a comprehensive needs assessment. This determines the focus areas of the Title I, Part A services. A targeted assistance school must identify students who are failing or most at risk of failing to meet state standards. An educational objective measure must be used to determine the students with the greatest academic needs. Those students with the greatest academic need in the identified focus areas are provided Title I, Part A services. The school must keep on file a list of this ranking of individual students.

Components of Targeted Assistance School: The targeted assistance school program must:

1. Use Title I, Part A resources for supplemental programs to help participating Title I children meet the academic expectations all children are expected to meet.
2. Ensure that planning for students receiving Title I services is incorporated into existing school planning.
3. Use effective instructional strategies that are based on scientific research that
   - Give primary consideration to providing extended learning time such as extended school year, before and after school, and summer programs;
   - Help provide an accelerated, high-quality curriculum; and
   - Minimize removing children from the regular classroom during regular school hours.
4. Coordinate with and support the regular educational program that may
   - Include services to assist preschool children's transition to elementary school;
   - If funds are not available from other public or private sources, then funds may be used to provide health, nutrition and other social services if these needs of the targeted students are part of the comprehensive needs assessment; and As a last resort, funds can be used to provide basic medical equipment such as eyeglasses, hearing aids and professional development to assist staff in identifying and meeting the comprehensive needs of eligible children.

5. Provide instruction by highly qualified staff.
6. Provide professional development opportunities with Title I, Part A resources and to the extent practicable, other sources, for administrators, teachers and other school staff who work with participating children.
7. Provide strategies to increase parent involvement, such as family literacy services.
8. Coordinate and integrate Federal, State, and local services and programs, including violence prevention, nutrition programs, housing programs, Head Start, adult education, vocational and technical education and job training.

Title I, Part A Teachers in a Targeted Assistance School: Title I services are provided to a select group of children rather than for overall school improvement. Each Title I school must provide each parent timely notice that the parent's child has been assigned, or has been taught for four or more consecutive weeks by, a teacher of a core academic subject who does not meet the qualification requirements. Each year the principals of a Title I school must certify in writing that the school is complying with NCLB's mandate for highly qualified teachers. Title I, Part A teachers must:

- Meet the *No Child Left Behind* (NCLB) definition of "highly qualified;" (Teachers hired with Title I, Part A funds after the first day of the 2002-03 school year who teach core academic subjects in a program supported with Title I, Part A funds must be highly qualified. All teachers who teach core academic subjects must be highly qualified by the end of 2006-07 school year. The requirement applies to all teachers in all elementary and secondary schools, regardless of funding. Core academic subjects are English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history and geography.
- Provide supplemental services to participating Title I students in the focus area(s) of the Title I, Part A program;
- Coordinate with and support the regular educational program; and
- Minimize removing students from the regular classroom for additional instruction. Pullout services may **not** be routinely scheduled. Title I services may **not** be the only instruction provided.

Title I, Part A Paraeducators in a Targeted Assistance School: In a targeted assistance school, paraeducators may be used to provide supplemental instruction to participating Title I students as long as they are under the direct supervision of a teacher. The district and school must ensure that Title I, Part A paraeducators:

- Have completed at least 2 years of study at an institute of higher education or obtained an associate's degree or met a rigorous standard through Kentucky's Paraeducator Assessment or a assessment that meets the required criteria.
- Be included in professional development activities.
- Be under the direct supervision of a teacher who has primary responsibility for providing instructional services. Direct supervision of a teacher is considered to be:
  - The teacher prepares the lessons and plans the instructional support activities the paraeducator carries out and evaluates the achievement of the students with whom the paraeducator is working; and
  - The paraeducator works in close and frequent proximity with the teacher.
- Are **not** pulled to be a substitute teacher in a classroom as the paraeducators would not be under the direct supervision of a teacher.

A program where a paraeducator provides instructional support and a teacher visits a site once or twice a week but otherwise is not in the classroom would be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher. A program where a

paraeducator works with a group of students in another location while the teacher provides instruction to the rest of the class would also be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher.

Because paraeducators provide instructional support, they should **not** be providing planned direct instruction or introducing to students new skills, concepts or academic content. Title I, Part A paraeducators in a targeted assistance school must provide additional assistance to identified Title I students:

- Participate in general professional development and school planning activities;
- Provide one-on-one tutoring at a time when a student would not otherwise receive instruction from a teacher;
- Provide assistance in a computer lab;
- Conduct parent involvement activities;
- Act as a translator; or
- Provide instructional services to students under the direct supervision of a teacher.

Non-instructional Duties: Title I, Part A paraeducators may assume limited non-instructional duties that are assigned to instructional staff paid with other funds as long as the amount of time spent on the limited duties is the same proportion of total work time as that of instructional staff at the same school.

Parent Involvement: A written parent involvement policy at the school level must be developed jointly with, agreed upon with, and distributed to parents of participating Title I, Part A children. The parent involvement policy must include:

- Expectations for parent involvement;
- Components for building capacity for more effective parent involvement;
- School-parent compacts, outlining shared responsibilities for high student performance;
- An annual evaluation of the content and effectiveness of the parent involvement activities in increasing participation of parents and whether there are barriers to greater participation.

Evaluation and School Improvement: Title I, Part A public schools are identified for Title I school improvement if they fail to make adequate yearly progress for 2 consecutive years. Each school identified for Title I improvement must make the necessary revisions in its Comprehensive School Improvement Plan in ways that have the greatest likelihood of improving the performance of participating children in meeting the state's student performance standards. The revised plan should be implemented immediately following such identification. A school that is identified for improvement must reserve and spend at least 10% of its Title I, Part A allocation for each fiscal year that the school is in improvement for professional development.

Supplement versus Supplant: Records must be maintained to document that Title I, Part A funds are spent on activities and services for Title I, Part A participating students. In a targeted assistance school, Title I funds must be used:

- To supplement, and **not** supplant, the amounts of funds that would be available from non-Federal sources for the education of students participating in the Title I, Part A program;
- For programs that provide services to participating Title I children identified as having the greatest academic need; and
- To provide services that are in addition to the regular instructional program.

TITLE I SCHOOL IMPROVEMENT UNDER NCLB

NCLB Title I, Part A, Sections 1111 and 1116

TITLE I SCHOOL IMPROVEMENT UNDER NCLB FOR 2006-07

NCLB Title I, Part A, Sections 1111 and 1116

As part of the *No Child Left Behind Act of 2001* (NCLB), states must use academic assessments and other indicators to annually review the progress of each school to determine whether the school makes adequate yearly progress. This technical assistance document briefly explains Kentucky's process for identifying schools that do not make adequate yearly progress. The document also contains information about the NCLB consequences for Title I schools that do not make adequate yearly progress. This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *LEA and School Improvement, Public School Choice,* and *Supplemental Educational Services* (revised June 2005) that may be found at **http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln**.

ADEQUATE YEARLY PROGRSS (AYP)

Adequate yearly progress (AYP) is the measure a state uses to determine if a school is making continuous and substantial improvement.

1. A school is determined to have made adequate yearly progress (AYP) for a school year if the school and all subpopulations of sufficient size:
   (a) Met annual measurable objectives (AM0) in reading and mathematics. The objectives are expressed as the percent of students at proficient and above in reading and mathematics. Multi-year averaging of the annual measurable objectives for reading and mathematics will be calculated and can include up to three years of data. The numbers (2) and (3) appear on the NCLB report to designate multi-year averaging of two or three years of data.
   (b) Showed progress (i.e., met requirements) on the "other academic indicator."
      - The other academic indicator is prior year graduation rate at the high school level. A high school is considered to have demonstrated growth on the "other academic indicator" if the school shows progress on the prior year graduation rate when compared to the year before; or meets the goals set for each year by the Kentucky Board of Education.
      - The other academic indicator is the prior year CATS classification at the elementary and middle school levels. An elementary or middle school is considered to have demonstrated growth on the "other academic indicator" if the school's prior year (2004) CATS classification is any category of meets goal or progressing **or** if in assistance, growth at or above the state average for the specific grade configuration occurs. Improvement above the state average is designated on the NCLB report with the letter "i" and both school and state average values are displayed.
   (c) Tested at least 95% of enrolled students and subpopulations of sufficient size. Multi-year averaging of the participation rate will be calculated and can include up to three years of data. The numbers (2) and (3) appear on the NCLB report to designate multi-year averaging of two or three years of data.
2. The specific subpopulations required for reporting NCLB AYP determinations are: All Students; Race and Ethnicity: White (non-Hispanic), African-American, Hispanic, and Asian; Limited English Proficiency; Economically Disadvantaged (Free/Reduced Lunch); and Students with Disabilities.
3. The following describes the number of full academic year students that must be in a group before the group is reported (the "n" count):

   For Reading & Mathematics AMOs:

(a) 10 per grade where NCLB assessments are administered; AND

(b) 60 per these grades combined* <u>or</u> 15% of the accountable students in these combined grades.

For Participation Rate:

(a) 10 per grade where NCLB assessments are administered; AND

(b) 60 per these grades combined.

**Sum of grades where KCCT reading and mathematics assessments are administered currently EL- 4/5, MS- 7/8, HS-10/11and submitting alternate portfolio students at grades 4, 8 and 12.*

4. As a safe harbor, a school that has not met the AMO in reading or mathematics is considered to have met the AMO if the school:
   (a) Reduced its percent of total students or subpopulation(s), that did not meet the AMO in reading or mathematics, scoring below proficient by 10%; AND
   (b) Met the criteria for demonstrating improvement on the academic index (improve or equal 100 or more) for students in the same population or subpopulation.
5. Adequate yearly progress (AYP) determinations are made annually for all schools. A school that receives Title I, Part A funds is **identified for improvement** if it fails to make AYP for two (2) consecutive years in the same content area. Not meeting the requirements for the other academic indicator or participation rate impacts both reading and mathematics. It is like missing the AMOs for reading and mathematics.
6. A Title I school is no longer identified for improvement once it has made AYP for 2 consecutive years.

NCLB CONSEQUENCES FOR TITLE I SCHOOLS NOT MAKING AYP

If a **Title I school** does not make adequate yearly progress (AYP) for two (2) consecutive years, the school is identified for improvement and continues to be identified for improvement until it has made AYP for two (2) consecutive school years. The following information outlines the consequences while a Title I school is identified for improvement. Kentucky is using the term *tier* to define the years of not making adequate yearly progress (AYP) and the NCLB consequences. **The consequences continue until the Title I school has made AYP for two (2) consecutive years.**

<u>Tier 1 of Consequences</u> = 2 consecutive years of not making AYP. Tier 1 includes the following:

- **Parent Notification** – The district must notify parents of all students in a Title I school that has not made AYP 2 consecutive years with the reasons the school is identified and what is being done to address the problem of low achievement. Parents must be notified **annually** of the progress made by the school.
- **Student Transfer Option (School Choice)** – The district must annually notify parents of **all** students in the identified Title I school of the option to transfer to another public school.
- **District Technical Assistance** – The district must provide on-going technical assistance as the identified Title I school develops and implements revisions in the comprehensive school improvement plan.
- **Revised Comprehensive School Improvement Plan** – The identified Title I school must revise its comprehensive improvement plan to address academic issues that caused the school to be identified.
- **Funds for Professional Development** – The identified Title I school must annually spend at least 10% of the Title I school allocation on professional development.

Tier 2 of Consequences = 3 years of not making AYP. Tier 2 includes all of the consequences listed in Tier 1 and the following:

- **Supplemental Educational Services** – The district must annually notify parents and implement supplemental educational services for eligible students in a Title I school that has not made AYP for 3 years.

Tier 3 of Consequences = 4 years of not making AYP. Tier 3 includes all of the consequences listed in Tier 1 and Tier 2 and the following:

- **Corrective Action** – The district must take annually corrective action toward a Title I school that has not made AYP for 4 years.

Tier 4 of Consequences = 5 years of not making AYP. Tier 4 includes all of the consequences listed in Tier 1, Tier 2 and Tier 3 and the following:

- **Plan for Restructuring** – The district must write a plan for alternative governance for a Title I school that has not made AYP for 5 years.

Tier 5 of Consequences = 6 years of not making AYP. Tier 5 includes all of the consequences listed in Tier 1, Tier 2, Tier 3, Tier 4 and the following:

- **Implement Restructuring (Alternative Governance)** – The district must implement the plan for alternative governance for a Title I school that has not made AYP for 6 years.

TITLE I SCHOOL IMPROVEMENT

District Responsibilities for a Title I School in Tier 1 Consequences

The district should ensure that all schools understand the components of adequate yearly progress and assist schools in interpreting the NCLB federal accountability report. The district should keep the school informed throughout the improvement process, including information about school choice and supplemental educational services. The district may facilitate planning for public school choice before assessment results are available. For example, transportation and communication plans may be developed before implementation is required. When one of its Title I schools is identified for improvement (Tier 1), the district must:

1. Ensure that parents are notified **annually** regarding identification for improvement.
2. Ensure that public school choice is **annually** provided for children whose parents wish to transfer them from the Title I school identified for improvement.
3. Ensure that the identified school **annually** receives technical assistance, both during the revision of its comprehensive school improvement plan and throughout the plan's implementation.

Notification to Parents

Meaningful parental involvement is one of the cornerstones of reform contained in the *No Child Left Behind Act*. It is essential that the district and school communicate with parents throughout the school improvement process and welcome them as key partners in addressing the academic issues that led to the school being identified for improvement. Information to parents must be in an understandable and uniform format. It must also, to the extent practical, be in a language the parents can understand. The initial notification to parents must include the following, and parents must be notified **annually** of the progress made by the school:

1. Explanation of what the identification means and how the school compares in terms of academic achievement to other schools served by Title I in the district and in Kentucky.
2. Reason(s) for the school being identified for improvement.
3. Explanation of what the school is doing to address the problem of low achievement.

4. Explanation of what the district is doing to help the school address the achievement problem.
5. Explanation of how the parents can become involved in addressing the academic issues that led to identification.
6. Explanation of the parents' options to transfer their child to another public school that is not identified for improvement.

Student Transfer Option (Public School Choice)

The district is required to **annually** offer **all** students enrolled in a Tier 1 school the option to transfer to another public school in the school district that has not been identified for improvement. The school of choice does not have to receive Title I services as long as it is **not** identified for improvement. A school that has not made AYP for two or more years is "identified as in improvement". While the consequences do not apply to non-Title I schools, a non-Title I school is still identified as in improvement and cannot be a school of choice. The district must provide an explanation of the choice option **to all parents of students enrolled in Title I schools that have been identified for school improvement, corrective action, or restructuring.** This notification must be in a comprehensive, easy-to-understand format and, to the extent practical, in a language the parents can understand. At a minimum, this notification must:

1. Inform parents that their child is eligible to attend another public school due to the identification of the current school as in need of improvement.
2. Identify each public school that the parent can select.
3. Include information on the academic achievement of the schools that the parent may select. The notification may include other information, such as a description of special academic programs, facilities, before-or-after school programs, the professional qualifications of teachers in the core academic subjects or parent involvement opportunities.

There may be very limited circumstances under which the option to transfer may not be possible, particularly in some sparsely populated areas. For example, a district with only one school at a particular grade level, or a district in which all schools at a grade level are identified for improvement, will not be able to offer the option to transfer to another public school in the district. In such cases, to the extent practical, the district must enter into cooperative agreements with other nearby school districts to permit transfers. **If an agreement cannot be arranged, the district should include an explanation in the notification to parents of why choice is not available.** In circumstances where the option to transfer is not possible, the district may offer supplemental educational services (SES) during the school's first year of improvement.

As soon as the Title I school is identified for improvement, the district must immediately notify all parents of the school choice option. The district must make choice available for students the first day of the school year. The notification must provide parents with enough relevant information to help them decide what school is best for their child.

The district must give **all** students in the identified school the opportunity to transfer to another public school. In implementing the option to transfer, there may be circumstances in which the district needs to give priority to the lowest-achieving children from low-income families. For example, if not all students can attend their first choice of schools, the district would give priority in assigning spaces to the low-achieving low-income students. If the district does not have sufficient funding to provide transportation to all students who wish to transfer, it would apply this priority in determining which students would receive transportation. The district must determine low-income using the same data that it uses in allocating Title I funds to schools. Usually low-income is based on free and reduced meal data. The district has flexibility in determining which students from low-income families are lowest achieving. Students from low-

income families might be rank-ordered based on their achievement levels (determined by using objective educational measures).

The district must offer more than one choice to students attending an identified school if there is more than one school in the district that is not identified for improvement. **Every student enrolled in a Title I school in improvement who wishes to transfer to a school that is not in need of improvement must have that opportunity.** The district may **not** use lack of capacity to deny students the option to transfer but may take capacity into consideration in deciding which choices to make available to students in the identified school. The district may consider the following to create capacity in schools to receive additional students:

- Reconfigure, as new classrooms, space in receiving schools that is currently not being used for instruction;
- Expand space in receiving schools, such as by reallocating portable classrooms within the district:
- Redraw the district's attendance zones, if insufficient capacity is available within the existing zones within which students would ordinarily select schools;
- Create satellite divisions of receiving schools, that is, classrooms that are under the supervision of the receiving school principal and whose teachers are part of the school faculty but that exist in neighboring buildings;
- Create new, distinct schools, with separate faculty, within the physical sites of schools identified for improvement;
- Develop distance learning programs, or entering into cooperative agreements with "virtual schools";
- Reshape long-range capital construction and renovation plans in order to ensure that schools that are likely to receive new students have additional space;
- Modify either the school calendar or the school day, such as through "shift" or "track" scheduling, in order to expand capacity;
- Ease capacity by initiating inter-district choice programs with neighboring districts.

Students planning to enter a school for the first time, such as entering kindergartners, or students moving from elementary to middle school, or those who have just moved into the school attendance area served by a Title I school, should have the same opportunity to exercise choice as students previously enrolled in a school.

A district may give students enrolled in Tier 1 schools the opportunity to obtain supplemental educational services, so long as they also offer those students the opportunity to change schools. Because the law requires the provision of choice (but not supplemental educational services) to all students in a Tier 1 school, all students who want to change schools must be able to do so, and their transportation needs must be met (subject to the 20 percent limit) before any of these students are given supplemental educational services.

If a district is subject to a desegregation plan, whether that plan is voluntary, court-ordered, or required by a federal or state administrative agency, the district is not exempt from offering students the option to transfer.

The district may set timelines for parents to make their decision on choice. The district must set a reasonable deadline by which parents must apply and ensure that the parents have a sufficient time and information to make an informed decision about selecting a school. The district should ensure that polices for receiving choice-related communications from parents do not impede parents' opportunities to exercise choice options. Parents should be able to communicate their choices in a variety of ways, including by standard mail, email or fax. The district should confirm with parents that it has received their communication regarding choice.

The district makes the final decision on the school each eligible child will attend. The district must take parent's preferences into consideration in making the decision. The district might

allow parents to rank-order their preference among the schools that are available to receive transfer students. Once the district has made its decision, parents must have the option to decline the opportunity to move their child to the new school.

The district may use Title I funds as well as other federal, state, local and private resources to pay for transportation for school choice required as part of the school improvement process. The district must offer choice to all students in an identified Title I school until the school has made AYP for 2 consecutive years and is no longer identified for improvement. The district must provide transportation for those students choosing the option to transfer while the school is identified for improvement. The district must permit the student to remain in the new school until he or she has completed the highest grade in the school. However, the district is no longer obligated to provide transportation for the student after the end of the school year in which the student's school of origin is no longer identified for improvement.

District Technical Assistance

The district must provide technical assistance to the Title I school(s) identified for improvement. The technical assistance must be provided as the school revises and implements its comprehensive school improvement plan. Technical assistance is practical advice that addresses specific areas for improvement. The technical assistance may be provided by the district, the Kentucky Department of Education, an institution of higher education, a private not-for-profit organization or a for-profit organization, an education service agency or another entity with experience in helping schools improve academic achievement. The technical assistance must include:

1. Assistance in analyzing data from CATS and examples of student work to identify and to address problems in instruction and problems, if any, in implementing Title I parental involvement requirements and to address solutions to the identified problems.
2. Assistance in identifying and implementing professional development, instructional strategies and methods of instruction that are based on scientifically-based research and that have been proven effective in addressing the specific instructional issues that caused the school to be identified for improvement.
3. Assistance in analyzing and revising the school's budget so that the school's resources are more effectively allocated to the activities most likely to increase student academic achievement and to remove the school from school improvement status.

It is crucial that the district align its assistance with the comprehensive improvement plan being revised by the school. The revisions in the improvement plan and the district assistance should be based on a close analysis of the school's demographic and achievement data, such as subpopulation performance and a comprehensive needs assessment that identifies both strengths and weaknesses. This close analysis will enable the district to target more accurately available resources to address identified deficiencies. The goals, objectives, and actions that result from the comprehensive analysis must realistically address the school's needs and systematically move it toward improvement.

School Responsibilities for a Title I School in Tier 1 Consequences

The process of school improvement begins with the school revising its comprehensive improvement plan to address the academic issues that caused it to be identified for improvement.

Revision of Comprehensive School Improvement Plan

A Title I school identified for Tier 1 consequences must revise its comprehensive improvement plan. The purpose of the plan is to improve the quality of teaching and learning in the school. The school must revise its plan in consultation with parents, school staff, district staff, and

outside specialists. If applicable, the school council should consider the recommendations of the scholastic audit, review, or self-study and decide how to amend the plan in light of the scholastic findings. The revised plan must:

1. Incorporate strategies based on scientifically-based research that will strengthen the core academic subjects in the school and address the specific academic issues that caused the school to be identified for improvement and may include a strategy for the implementation of a comprehensive school reform model.
2. Adopt policies and practices concerning the school's core academic subjects that have the greatest likelihood of ensuring that all groups of students (economically disadvantaged students; students from major racial and ethnic groups; students with disabilities; and students with limited English proficiency) enrolled in the school will meet the proficient level of achievement by 2014 as measured by CATS.
3. Provide an assurance that the school will spend at least 10% of its Title I school allocation for professional development that directly addresses academic achievement and specify how the professional development funds will be used to remove the school from its improvement status.
4. Incorporate, as appropriate, activities before school, after school, during the summer and during any extension of the school year.
5. Establish specific annual, measurable objectives for continuous and substantial progress of each group of students that will ensure that all groups of students meet the proficient level of achievement by 2014 as measured by CATS.
6. Include strategies to promote effective parental involvement, engage parents as partners with teachers in educating their children, and involve parents in meaningful decision-making at the school.
7. Incorporate a teacher-mentoring program that teams up novice teachers with more experienced professionals who serve as role models and provide practical support and encouragement.

Peer Review of School Plan

The revisions to the school's plan must be completed no later than three months after the school has been identified for improvement. This timeline allows the school to analyze data from the NCLB reports available in August and the CATS data available in September. The district must establish a peer review process for the revised school comprehensive improvement plan within 45 days of its submission. Peer reviewers should include teachers and administrators from schools or districts similar to the one in improvement but significantly more successful in meeting the learning needs of their students. Staff with demonstrated effectiveness and recognized expertise in school improvement will be able to evaluate the quality of the plan and make suggestions. The peer review may include the following guiding questions:

1. What does the data say about our school?
2. What do we tackle first (priority needs)?
3. What do we have in place to address the priority needs?
4. What else do we need?

Once the peer review has been completed, the district must work with the school to make any necessary changes and must approve the plan as soon as it satisfactorily meets the requirements. The school must begin implementing the revised plan as soon as the district approves the plan. The plan must be implemented and reviewed throughout the time the school is identified for improvement.

Funds for Professional Development at the School Level

The identified school must spend at least **10% of its Title I, Part A school allocation** for professional development for **each fiscal year** that the school is in school improvement status. The district should set a 12 month timeline for identified schools to expend the funds and monitor the expenditure of the funds. The funds should address needs identified in the school plan and impact instruction during the year the school is identified for improvement. The funds must be used to provide the teachers, paraprofessionals, and principals high-quality professional development that:

1. Directly addresses the academic achievement problem that caused the school to be identified for school improvement. In most cases, the professional development will focus on the teaching and learning process, such as increasing content knowledge, the use of scientifically based instructional strategies and the alignment of classroom activities with academic content standards and assessments. Another example of useful professional development would be training teachers to analyze classroom and school-level data and use it to inform their instruction.
2. Meets the requirements for highly qualified teachers and paraprofessionals. The academic success of students correlates highly with the qualifications and skills of their teachers.
3. Is provided in a manner that affords increased opportunity for participating in the professional development.

District Responsibilities for a Title I School in Tier 2 Consequences

The district must continue all of the consequences in Tier 1. **Parents must be notified annually of the progress made by the school.** In addition to the consequences in Tier 1, the district must make supplemental educational services available for low-income students attending a school that does not make AYP after one year of school improvement (3 years of not making AYP). Parents of eligible students may continue to choose the option to transfer **or** may choose supplemental services.

Supplemental Educational Services

Supplemental educational services (SES) provide extra academic assistance for **low-income** students attending a school identified for Tier 2 consequences. The purpose of these services is to ensure that the students increase their academic achievement, particularly in reading, language arts and mathematics. These academic services may include assistance such as tutoring, remediation, and academic intervention. Instruction must take place outside the regular school day, such as before or after school, on weekends, or during the summer. Supplemental educational services must be of high quality, research based and specifically designed to increase student academic achievement.

Providers may be nonprofit entities, for-profit entities, districts (that are not in Title I school improvement), public schools (that are not in Title I school improvement), private schools, after-school centers, cooperative educational service agencies, institutions of higher education, private businesses, and community-based/faith-based organizations. Providers must be approved by the Kentucky Department of Education. Parents select supplemental service providers from the state-approved provider list. A district approved as a provider must cease offering its supplemental educational services if it becomes identified for improvement. The services should cease as soon as possible but no later than the end of the semester.

Eligible children are those children from low-income families attending Title I schools identified for Tier 2 consequences. In most districts in Kentucky, low-income is based on eligibility for free/reduced meals. In circumstances where more students request services than the district can fund, the district must place a priority on serving those low-income students who are the lowest achieving. In this situation, the district should use objective criteria to determine the

lowest-achieving students. For example, the district may focus services on the lowest-achieving eligible students in the subject area that caused the school to be identified for improvement. The services should be tailored to meet the instructional needs of eligible students to increase their academic achievement and help them attain proficiency in meeting the state's achievement standards.

Parents of eligible children in a Tier 2 school need to be informed of both options: transferring to another public school or receiving supplemental educational services. Both options need to be discussed in the notification to parents so that parents may make an informed decision. Supplemental services should begin as soon parents have had the opportunity to make an informed decision about the selection of a provider.

State responsibilities focus on ensuring that eligible students receive additional academic assistance. Specifically, the Kentucky Department of Education:

1. Provides information for districts to identify schools for which supplemental educational services are required.
2. Develops and applies objective criteria to potential providers that are based on a demonstrated record of effectiveness in increasing academic proficiency.
3. Maintains a list of approved providers across the state, by school district, from which parents may select providers.
4. Promotes maximum participation by SES providers to ensure that parents have as many choices as possible.
5. Monitors the quality and effectiveness of the services offered by approved providers and monitors districts to ensure that they are implementing SES requirements.

District responsibilities focus on notifying parents about the availability of supplemental educational services, arranging for the services to be provided and monitoring the services for the purpose of improving academic achievement. Specifically, the district:

1. Notifies parents of the supplemental educational services option. The district should work to ensure that parents have comprehensive, easy-to-understand information about supplemental educational services. To the extent possible, communications must also be in a language parents can understand. The district may establish a reasonable deadline by which parents must request services. In establishing this timeframe, the district must ensure that the parents have sufficient time and information to make an informed decision about requesting supplemental educational services and selecting a provider. The notification must occur at least annually and must include:
   - Availability of the supplemental educational services and
   - List of approved providers whose services are available with a brief description of the provider's services, qualifications, and demonstrated effectiveness of each approved provider to assist the parent in selecting a provider. The list of approved providers is available on the KY Department of Education website. The list is available as a spreadsheet so that the district may shorten the list to providers able to serve the geographical area.
2. Helps parents choose a provider from the state approved list, if requested. Parents choose the supplemental educational service provider for their children from among the providers approved by the state.
3. Coordinates with the identified school to formulate procedures and process for provider meetings, parent education, provider reporting, and goal-setting sessions.
4. Plans budgetary needs for eligible students who choose to receive the services. The district may use Title I funds as well as other federal, state, local and private resources to pay for supplemental educational services required as part of the school improvement process. The per-child cost for supplemental educational services must be the lesser of the actual cost of the services or the per-child allocation of Title I funds to the district. The per-child

allocation is determined by dividing the district's Title I, Part A allocation by the number of children from families below the poverty line (based on Census poverty data, not federal school lunch data) in the district. This cap applies to the cost of instructional services only. The district may incur additional per-child costs related to the administration of supplemental educational services, transportation of students to a provider or appropriate accommodations for students with disabilities. The district may provide transportation to service providers but is not required to do so. Transportation costs to service providers may not be counted toward satisfying the district's obligation to spend up to an amount equal to 20 percent of its Title I, Part A allocation on choice-related transportation and supplemental educational services.

5. Agrees, along with the parents and provider, on "achievement goals" for the student; **and** enters into an agreement with a provider selected by parents.
6. Arranges with the providers for district facility use dependent upon district/school policy.
7. Disburses payments to the providers upon receipt of the required participation documentation.
8. Provides the information the KY Department of Education needs to monitor the quality and effectiveness of the services offered by providers.
9. Protects the privacy of students who receive supplemental educational services.

The district may provide additional information to parents, as appropriate. However, any additional information in a notice should be balanced and should not attempt to dissuade parents from exercising their option to obtain supplemental educational services for their child. The district might also want to consider multiple avenues for providing *general* information about supplemental educational services, including newspapers, Internet, or notices mailed or sent to homes. Districts that are most effective in reaching eligible families are those that provide information to parents through various means, including less traditional forms of communication, such as radio and TV ads, and notices at venues that parents may frequent, such as movie theaters, shopping malls, beauty parlors, and places of worship. In providing this information, the district must take care that it does not disclose to the public the identity of any student eligible for supplemental educational services without the written permission of the parent.

The district should make its supplemental educational services enrollment form easily available for parents to access and should widely distribute the form. For example, the district could post the form on its website and mail the form home to parents, as well as leave copies of the form at the schools that have students eligible for supplemental educational services and at other district offices and sites where parents may go. Additionally, the district should not restrict the distribution of enrollment forms (including the photocopying of forms) by non-district individuals. Finally, the district should ensure that there is an open, adequate, and reasonable process for parents to submit application forms.

There are several ways in which the district may ensure that information on potential program providers is made available to parents of eligible students. Here are some suggestions:

1. Include a parental consent line on the supplemental educational services application form, so that parents can provide consent to share information with providers at the same time that they express their interest in receiving services.
2. Ask providers to give the district stamped envelopes containing information about the program to be mailed by the district to parents of eligible students. Before doing so, the district could let the provider know *how many* students are eligible, but not the names.
3. Hold an "open house" or "provider fair" and invite parents to come meet with providers about their supplemental educational service programs.
4. Provide information about providers to parents in school newsletters.

5. Leave information about each provider at identified schools for parents to review when they visit the school. Many providers have brochures and promotional materials that can be left at school sites for parents to read.

Provider responsibilities include being approved by the Kentucky Department of Education to provide supplemental educational services. Specifically, providers:

1. Demonstrate effectiveness in improving academic achievement of children.
2. Document that the instructional practices used are of high quality, are based on appropriate research, and include the Kentucky content standards.
3. Have evidence that the provider is financially sound.
4. Ensure that they will utilize curriculum and other components of design as submitted to the state. A provider cannot change the curriculum/program design from that which was approved by the Kentucky Department of Education.
5. Have a plan for instruction in the areas of reading, language arts, and/or mathematics built upon initial assessment/academic evaluation of each student's skills in one or more of these subjects.
6. Provide services under only one company name in individual schools or districts to allow for clear choices for parents.

Once parents select a provider for their child, the provider enters into an agreement with the district that includes the following:

1. Specific achievement goals for the student that are developed in consultation with the student's parents.
2. Description of how the student's progress will be measured and how the student's parents and teachers will be regularly informed of that progress.
3. Timetable for improving the student's achievement that, in the case of a student with disabilities, must be consistent with the student's individualized education program under section 614(d) of the Individuals with Disabilities Education Act and in the case of a student covered under Section 504, must be consistent with the provision of an appropriate education under Section 504.
4. Provision for services on a regular basis for the duration of the contract and submission of attendance and tracking data in a timely manner to the district.
5. Provision for termination of the agreement if the provider fails to meet the student's specific achievement goals and the timetable for meeting the goals.
6. Provisions governing payment for the services by the district that may include provisions addressing missed sessions.
7. Provision prohibiting the provider from disclosing to the public the identity of any student eligible for or receiving supplemental educational services without the written permission of the student's parents.
8. Assurance that supplemental educational services will be provided consistent with applicable health, safety and civil rights laws.

The district may **not** impose requirements that relate to whether a provider has an effective educational program; doing so would undermine the State's authority to establish standards for approval of providers as having effective programs and to determine which providers meet those standards. For example, the district may not require that providers offer a certain number of hours of services to receive the statutory per-pupil amount for services, that providers employ only State-certified teachers as tutors, or that providers' programs have certain student-teacher ratios. These types of requirements may create a "one-size-fits-all" model of services that does not effectively take into consideration the varied needs of students and undermines parents' opportunity to select the most appropriate provider and services for their child. This type of intervention by the district in program design is not provided for in the statute or regulations.

Under no circumstances should the district refuse to offer as an option to parents any provider on the State-approved list because of program design concerns.

The district may use the agreement (contract) available in the *Supplemental Educational Services Toolkit* on the Kentucky Department of Education website. A district that is an approved provider and is selected by a parent must prepare an agreement that contains the information listed. Although the district is not formally entering into an agreement with itself as the provider, the information is necessary so that parents know the achievement goals for the student, how progress will be measured and the timetable for improving the student's achievement. If the district fails to meet the student's progress goals, the parent should be able to request services from another provider.

Parents are to be active participants in the supplemental educational services program. Parents of students who participate in supplemental educational services are expected to:

1. Return the provider selection form.
2. Work with the provider and the district representative to identify specific academic achievement goals for the student.
3. Ensure that their child receives services by monitoring their child's attendance and progress.
4. Inform provider and district if their child no longer intends to participate.
5. Receive (along with the school) information about their child's progress.

The provider must continue to provide supplemental educational services to students who are receiving the services until the end of the school year in which the services were first received. However, the sufficiency of funds and the intensity of services selected (such as the number of sessions per week) may limit the availability of services to a shorter period of time. In such case, the parent should be made aware of the anticipated duration of services and agree to it. Supplemental educational services must be provided until the school has made AYP for 2 consecutive years and is no longer identified for improvement.

School Responsibilities for a Title I School in Tier 2 Consequences

The consequences continue until the identified school has made AYP for 2 consecutive years. The school must continue to:

1. Review and implement the revisions in its comprehensive improvement plan.
2. Spend at least 10% of its Title I school allocation for each fiscal year that the school is in school improvement status for professional development. The district should set a 12 month timeline for identified schools to expend the funds and monitor the expenditure of the funds.

District Responsibilities for a Title I School in Tier 3 Consequences

The district must continue all of the consequences in Tier 1 and Tier 2. **Parents must be notified annually of the progress made by the school.** In addition to the consequences in Tier 1 and Tier 2, the district must take **corrective action** toward a Title I school if it fails to make AYP after two (2) years of improvement (4 years of not making AYP). Corrective action is a significant intervention in a school that is designed to remedy the school's persistent inability to make AYP. Actions must be consistent with state law. If a Title I schools fails to make AYP after two (2) years of improvement, the district must take at **least one** of the following actions:

1. Provide, for all relevant staff, appropriate, scientifically research-based professional development that is likely to improve the academic achievement of low-performing students.
2. Institute and implement a new curriculum and provide appropriate professional development to support its implementation.
3. Extend the length of the school day or year.
4. Replace school staff relevant to the improvement.

5. Significantly decrease management authority in the school.
6. Appoint an outside expert to advise the school how to revise and strengthen the improvement plan and how to address the specific issues underlying the school's continued inability to make AYP.
7. Restructure the internal organization of the school.

The district must publish and disseminate information regarding any corrective action taken at a school to the public and to the parents of each student enrolled in the school in an understandable and uniform format. The information should, to the extent practical, be provided in a language that the parents can understand. The information may be disseminated through such means as the Internet, the media and public agencies.

School Responsibilities for a Title I School in Tier 3 Consequences

The consequences continue until the identified school has made AYP for 2 consecutive years. The school must continue to:

1. Review and implement the revisions in its comprehensive improvement plan.
2. Spend at least 10% of its Title I school allocation for each fiscal year that the school is in school improvement status for professional development. The district should set a 12 month timeline for identified schools to expend the funds and monitor the expenditure of the funds.

District Responsibilities for a Title I School in Tier 4/ 5 Consequences

The district must continue all of the consequences in Tier 1, Tier 2, Tier 3. **Parents must be notified annually of the progress made by the school.** In addition to the consequences in Tier 1, Tier 2, and Tier 3, the district must **develop** a restructuring plan for a Title I school if it fails to make AYP after one year of corrective action (5 years of not making AYP). In restructuring the district undertakes a major reorganization of a school, making fundamental reforms, such as significant changes in the school's staffing and governance. The purpose of restructuring is to improve student academic achievement and enable the school to make AYP. Any alternative governance arrangements for the school must be consistent with state law. When a district identifies a school for restructuring, it must:

1. Provide both parents and teachers with prompt notice of the decision.
2. Provide both groups with the opportunity to comment on the decision before it takes any restructuring action.
3. Invite both teachers and parents to participate in the development of the school's restructuring plan.

The district must prepare a plan and make necessary arrangements to carry out alternative governance arrangements for the school consistent with state law. If the school fails to make AYP after 2 years of corrective action (6 years of not making AYP), the district must then **implement** the restructuring plan. The plan must include one of the following alternative governance:

1. Reopening the school as a public charter school.
2. Replacing all or most of the school staff (including the principal) that are relevant to the failure to make adequate yearly progress.
3. Entering into a contract with an entity, such as a private management company, with a demonstrated record of effectiveness, to operate the public school.
4. Turning the operation of a school over to the state educational agency if permitted under state law and agreed to by the state.
5. Any other major restructuring of the school's governance arrangement that makes fundamental reforms, such as significant changes in the school's staffing and governance,

to improve student achievement in the school and that has substantial promise of enabling the school to make adequate yearly progress.

School Responsibilities for a Title I School in Tier 4/ 5 Consequences

The consequences continue until the identified school has made AYP for 2 consecutive years. The school must continue to:

1. Review and implement the revisions in its comprehensive improvement plan.
2. Spend at least 10% of its Title I school allocation for each fiscal year that the school is in school improvement status for professional development. The district should set a 12 month timeline for identified schools to expend the funds and monitor the expenditure of the funds.

Financial Requirements for School Choice and Supplemental Educational Services (SES) for 2006-07

The district must annually use **up to** an amount **equal to** 20% of its Title I, part A allocation to cover choice-related transportation costs and for supplemental educational services. Within the 20 percent, the district must spend (if needed):

1. An amount equal to 5 percent for choice-related transportation.
2. An amount equal to 5 percent for supplemental educational services.
3. An amount equal to 10 percent for choice-related transportation or supplemental educational services or both, as the district determines.

The phrase “an amount equal to” means that the funds required to pay the costs of choice-related transportation and supplemental services need not come from the Title I allocation but may be provided from other federal, state, local and private sources. Title I improvement funds; regular Title I, Part A funds; Title V, Part A funds; Rural and Low-Income Schools or Small Rural School Achievement funds; and state/local funds may be used.

Additionally, the district may use funds transferred to Title I, Part A from other federal education programs to pay such costs. Programs eligible for transfers include Title II, Part A Improving Teacher Quality Grants; Title II, Part D Educational Technology Grants; Title IV, Part A Safe and Drug-Free Schools and Communities Grants; and Title V, Part A Innovative Program Grants. A district not identified for improvement under Title I may **transfer up to 50 percent** of each fiscal year’s funds for the applicable programs. A district identified for improvement under Title I may **transfer up to 30 percent** of each fiscal year’s funds for the applicable programs. When a district is identified for improvement, transferred funds must be used for district improvement activities. A district identified for corrective action may **not** transfer funds from one program to another.

The 20 percent must be applied to the total Title I, Part A allocation including any transferred funds. The 20 percent must be calculated before the district takes any reservations “off the top” of its Title I, Part A allocation for administrative costs, parent involvement, private school equitable participation, or other purposes.

Some districts, in a given year, will not be required to provide supplemental educational services because they have no schools identified for Tier 2 consequences. In this situation, the district must spend the equivalent of 20 percent of the Title I, Part A allocation on choice-related transportation or a lesser amount that satisfies all of the demand from the parents of students attending identified schools. The same is true for supplemental educational services if the district has schools identified for Tier 2 consequences but no funds are spent on choice-related transportation. Actual expenditures will depend on factors such as the number of students exercising the choice option or receiving supplemental educational services and the costs of satisfying these requests.

The district may count the portion of its transportation budget used to provide choice toward the school choice expenditure requirement. The portion counted toward the expenditure requirement is the cost that the district incurs in transporting students who meet the following criteria:

1. The students' "home" Title I school has been identified for improvement;
2. The students have chosen the option to transfer to another school under the Title I school choice option; and
3. The students are using district transportation to attend the selected school.

The district calculates the amount of its transportation budget that it counts for school choice by determining the portion of children transported who meet the criteria listed above. For example, if 10% of the district's students who receive transportation meet the criteria, the district could count 10% of its transportation budget toward the expenditure requirement. The district should maintain clear records on how the calculation was done.

A district should provide full opportunity for eligible students to change schools (and receive transportation) and to receive supplemental educational services before determining that a lesser amount of funding (that is, an amount less than 20 percent of its allocation) for these two activities is needed. Before determining that an amount less than 20 percent of its allocation is needed for choice-related transportation and supplemental educational services, the district should be able to document that it has fully met demands for these services. The district should consider whether it has:

- Appropriately notified all eligible parents of the availability of public school choice and supplemental educational services;
- Adequately publicized the options to parents in understandable formats and multiple forums; and
- Offered parents a reasonable period of time to investigate their options and submit their requests for either public school choice or supplemental educational services.

Because spending requirements for choice-related transportation and supplemental educational services are calculated on the basis of the district's annual Title I, Part A allocation, **actual costs must be linked to the fiscal year of the allocation**. Spending requirements continue until the identified school has made AYP for 2 consecutive years.

The chart contains the following:

- Column A – All districts are listed. **The amounts shown in Column C and Column E apply only to districts with schools identified for improvement (Tier 1 and Tier 2), corrective action (Tier 3), or restructuring (Tier 4 and Tier 5).**
- Column B – The final Title I, Part A allocation for each district is used for calculating the 20% for school choice and SES and for calculating the maximum per-child expenditure for SES.
- Column C – The maximum required for school choice (transportation for the option to transfer) and supplemental educational services (SES) is 20% of the district's Title I allocation.
- Column D – The number of poverty children from the U.S. Census is used to determine the maximum per-child expenditure for SES.
- Column E – The maximum per-child expenditure for SES is calculated by dividing the district Title I allocation by the number of census poverty children. The district must pay the lesser of the actual cost of SES or the amount listed in Column E.

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Financial Requirements for School Choice and Supplemental Educational Services (SES) 2006-07				
Column A	Column B	Column C	Column D	Column E
District	Preliminary 2006-07 Title I Allocation	Max. Req. For School Choice & And SES	# Poverty Children from US Census	Max. Per-Child Exp. For SES
ADAIR CO	$973,325	$194,665	773	$1,259
ALLEN CO	$738,475	$147,695	635	$1,163
ANCHORAGE IND	$0	$0	11	$0
ANDERSON CO	$394,563	$78,913	430	$918
ASHLAND IND	$1,104,826	$220,965	900	$1,228
AUGUSTA IND	$70,368	$14,074	58	$1,213
BALLARD CO	$293,308	$58,662	257	$1,141
BARBOURVILLE IND	$265,033	$53,007	145	$1,828
BARDSTOWN IND	$591,231	$118,246	514	$1,150
BARREN CO	$807,653	$161,531	691	$1,169
BATH CO	$644,723	$128,945	530	$1,216
BEECHWOOD IND	$36,019	$7,204	17	$2,119
BELL CO	$1,683,802	$336,760	1,085	$1,552
BELLEVUE IND	$223,320	$44,664	194	$1,151
BEREA IND	$236,120	$47,224	204	$1,157
BOONE CO	$1,527,455	$305,491	1,514	$1,009
BOURBON CO	$460,087	$92,017	402	$1,144
BOWLING GREEN IND	$1,128,949	$225,790	893	$1,264
BOYD CO	$696,078	$139,216	588	$1,184
BOYLE CO	$360,660	$72,132	345	$1,045
BRACKEN CO	$189,696	$37,939	171	$1,109
BREATHITT CO	$1,404,271	$280,854	947	$1,483
BRECKINRIDGE CO	$738,367	$147,673	633	$1,166
BULLITT CO	$1,498,694	$299,739	1,516	$989
BURGIN IND	$37,641	$7,528	36	$1,046
BUTLER CO	$604,409	$120,882	517	$1,169
CALDWELL CO	$467,141	$93,428	397	$1,177
CALLOWAY CO	$692,513	$138,503	593	$1,168
CAMPBELL CO	$334,326	$66,865	336	$995
CAMPBELLSVILLE IND	$702,124	$140,425	455	$1,543
CARLISLE CO	$187,863	$37,573	156	$1,204
CARROLL CO	$388,904	$77,781	331	$1,175
CARTER CO	$1,672,555	$334,511	1,304	$1,283
CASEY CO	$1,120,530	$224,106	825	$1,358
CAVERNA IND	$336,073	$67,215	261	$1,288
CHRISTIAN CO	$3,160,494	$632,099	2,427	$1,302
CLARK CO	$1,178,969	$235,794	1,023	$1,152
CLAY CO	$2,425,926	$485,185	1,599	$1,517
CLINTON CO	$665,016	$133,003	458	$1,452
CLOVERPORT IND	$78,385	$15,677	60	$1,306
CORBIN IND	$441,541	$88,308	376	$1,174
COVINGTON IND	$2,744,217	$548,843	1,963	$1,398

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Financial Requirements for School Choice and Supplemental Educational Services (SES) 2006-07

Column A	Column B	Column C	Column D	Column E
District	Preliminary 2006-07 Title I Allocation	Max. Req. For School Choice & And SES	# Poverty Children from US Census	Max. Per-Child Exp. For SES
CRITTENDEN CO	$431,321	$86,264	364	$1,185
CUMBERLAND CO	$448,648	$89,730	354	$1,267
DANVILLE IND	$498,357	$99,671	411	$1,213
DAVIESS CO	$1,387,317	$277,463	1,362	$1,019
DAWSON SPRINGS IND	$191,105	$38,221	133	$1,437
DAYTON IND	$311,042	$62,208	256	$1,215
EAST BERNSTADT IND	$98,735	$19,747	68	$1,452
EDMONSON CO	$550,286	$110,057	465	$1,183
ELIZABETHTOWN IND	$245,804	$49,161	222	$1,107
ELLIOTT CO	$496,200	$99,240	353	$1,406
EMINENCE IND	$105,619	$21,124	87	$1,214
ERLANGER-ELSMERE IND	$369,389	$73,878	384	$962
ESTILL CO	$956,846	$191,369	758	$1,262
FAIRVIEW IND	$161,374	$32,275	132	$1,223
FAYETTE CO	$8,400,790	$1,680,158	6,286	$1,336
FLEMING CO	$730,243	$146,049	599	$1,219
FLOYD CO	$3,045,743	$609,149	2,271	$1,341
FORT THOMAS IND	$169,801	$33,960	177	$959
FRANKFORT IND	$271,039	$54,208	168	$1,613
FRANKLIN CO	$896,784	$179,357	928	$966
FULTON CO	$334,017	$66,803	248	$1,347
FULTON IND	$255,468	$51,094	157	$1,627
GALLATIN CO	$348,598	$69,720	316	$1,103
GARRARD CO	$586,362	$117,272	521	$1,125
GLASGOW IND	$687,854	$137,571	529	$1,300
GRANT CO	$827,139	$165,428	717	$1,154
GRAVES CO	$898,550	$179,710	807	$1,113
GRAYSON CO	$1,196,889	$239,378	996	$1,202
GREEN CO	$525,359	$105,072	436	$1,205
GREENUP CO	$969,058	$193,812	815	$1,189
HANCOCK CO	$227,467	$45,493	216	$1,053
HARDIN CO	$2,782,769	$556,554	2,219	$1,254
HARLAN CO	$2,684,753	$536,951	1,822	$1,474
HARLAN IND	$278,387	$55,677	172	$1,619
HARRISON CO	$604,535	$120,907	552	$1,095
HARRODSBURG IND	$309,223	$61,845	263	$1,176
HART CO	$970,883	$194,177	755	$1,286
HAZARD IND	$399,862	$79,972	269	$1,486
HENDERSON CO	$1,576,228	$315,246	1,360	$1,159
HENRY CO	$419,024	$83,805	373	$1,123
HICKMAN CO	$206,665	$41,333	169	$1,223
HOPKINS CO	$1,817,679	$363,536	1,534	$1,185
JACKSON CO	$1,138,046	$227,609	756	$1,505

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Financial Requirements for School Choice and Supplemental Educational Services (SES) 2006-07				
Column A	Column B	Column C	Column D	Column E
District	Preliminary 2006-07 Title I Allocation	Max. Req. For School Choice & And SES	# Poverty Children from US Census	Max. Per-Child Exp. For SES
JACKSON IND	$79,974	$15,995	49	$1,632
JEFFERSON CO	$30,285,051	$6,057,010	19,985	$1,515
JENKINS IND	$299,634	$59,927	204	$1,469
JESSAMINE CO	$1,427,242	$285,448	1,237	$1,154
JOHNSON CO	$1,183,193	$236,639	932	$1,270
KENTON CO	$1,087,834	$217,567	1,079	$1,008
KNOTT CO	$1,413,014	$282,603	901	$1,568
KNOX CO	$2,744,406	$548,881	1,863	$1,473
LARUE CO	$557,661	$111,532	440	$1,267
LAUREL CO	$3,018,516	$603,703	2,421	$1,247
LAWRENCE CO	$1,146,869	$229,374	848	$1,352
LEE CO	$679,246	$135,849	447	$1,520
LESLIE CO	$1,053,289	$210,658	691	$1,524
LETCHER CO	$1,325,846	$265,169	1,018	$1,302
LEWIS CO	$1,080,592	$216,118	771	$1,402
LINCOLN CO	$1,272,665	$254,533	1,044	$1,219
LIVINGSTON CO	$298,745	$59,749	258	$1,158
LOGAN CO	$673,950	$134,790	616	$1,094
LUDLOW IND	$257,157	$51,431	217	$1,185
LYON CO	$176,709	$35,342	152	$1,163
MADISON CO	$2,318,438	$463,688	1,897	$1,222
MAGOFFIN CO	$1,404,357	$280,871	902	$1,557
MARION CO	$745,592	$149,118	664	$1,123
MARSHALL CO	$759,935	$151,987	692	$1,098
MARTIN CO	$1,168,860	$233,772	835	$1,400
MASON CO	$688,067	$137,613	606	$1,135
MAYFIELD IND	$590,239	$118,048	460	$1,283
MCCRACKEN CO	$1,233,834	$246,767	1,057	$1,167
MCCREARY CO	$2,094,638	$418,928	1,255	$1,669
MCLEAN CO	$364,798	$72,960	316	$1,154
MEADE CO	$664,587	$132,917	663	$1,002
MENIFEE CO	$473,822	$94,764	355	$1,335
MERCER CO	$374,773	$74,955	339	$1,106
METCALFE CO	$645,377	$129,075	483	$1,336
MIDDLESBORO IND	$837,490	$167,498	586	$1,429
MONROE CO	$705,339	$141,068	534	$1,321
MONTGOMERY CO	$923,429	$184,686	775	$1,192
MONTICELLO IND	$457,223	$91,445	287	$1,593
MORGAN CO	$926,808	$185,362	676	$1,371
MUHLENBERG CO	$1,385,807	$277,161	1,194	$1,161
MURRAY IND	$261,448	$52,290	226	$1,157
NELSON CO	$596,702	$119,340	589	$1,013
NEWPORT IND	$1,124,475	$224,895	885	$1,271

SCHOOL IMPR

Financial Requirements for School Choice and Supplemental Educational Services (SES) 2006-07				
Column A	Column B	Column C	Column D	Column E
District	Preliminary 2006-07 Title I Allocation	Max. Req. For School Choice & And SES	# Poverty Children from US Census	Max. Per-Child Exp. For SES
NICHOLAS CO	$271,212	$54,242	225	$1,205
OHIO CO	$1,005,658	$201,132	881	$1,141
OLDHAM CO	$537,510	$107,502	584	$920
OWEN CO	$450,803	$90,161	392	$1,150
OWENSBORO IND	$1,636,528	$327,306	1,275	$1,284
OWSLEY CO	$671,944	$134,389	363	$1,851
PADUCAH IND	$1,593,022	$318,604	1,166	$1,366
PAINTSVILLE IND	$272,013	$54,403	197	$1,381
PARIS IND	$275,572	$55,114	223	$1,236
PENDLETON CO	$500,907	$100,181	462	$1,084
PERRY CO	$2,021,002	$404,200	1,317	$1,535
PIKE CO	$3,215,362	$643,072	2,654	$1,212
PIKEVILLE IND	$358,677	$71,735	284	$1,263
PINEVILLE IND	$292,633	$58,527	152	$1,925
POWELL CO	$920,236	$184,047	727	$1,266
PROVIDENCE IND	$215,940	$43,188	158	$1,367
PULASKI CO	$2,182,130	$436,426	1,798	$1,214
RACELAND IND	$140,101	$28,020	124	$1,130
ROBERTSON CO	$125,352	$25,070	94	$1,334
ROCKCASTLE CO	$942,095	$188,419	746	$1,263
ROWAN CO	$825,994	$165,199	684	$1,208
RUSSELL CO	$961,832	$192,366	744	$1,293
RUSSELL IND	$253,412	$50,682	271	$935
RUSSELLVILLE IND	$493,531	$98,706	344	$1,435
SCIENCE HILL IND	$65,649	$13,130	50	$1,313
SCOTT CO	$916,823	$183,365	877	$1,045
SHELBY CO	$797,151	$159,430	815	$978
SILVER GROVE IND	$40,339	$8,068	38	$1,062
SIMPSON CO	$619,953	$123,991	534	$1,161
SOMERSET IND	$437,966	$87,593	352	$1,244
SOUTHGATE IND	$18,477	$3,695	23	$803
SPENCER CO	$279,866	$55,973	275	$1,018
TAYLOR CO	$369,360	$73,872	371	$996
TODD CO	$606,025	$121,205	507	$1,195
TRIGG CO	$384,593	$76,919	349	$1,102
TRIMBLE CO	$303,501	$60,700	279	$1,088
UNION CO	$524,490	$104,898	480	$1,093
WALTON VERONA IND	$107,955	$21,591	65	$1,661
WARREN CO	$2,354,609	$470,922	1,974	$1,193
WASHINGTON CO	$388,008	$77,602	352	$1,102
WAYNE CO	$1,047,914	$209,583	828	$1,266
WEBSTER CO	$301,175	$60,235	278	$1,083
WEST POINT IND	$83,265	$16,653	57	$1,461

SCHOOL IMPR

Financial Requirements for School Choice and Supplemental Educational Services (SES) 2006-07				
Column A	Column B	Column C	Column D	Column E
District	Preliminary 2006-07 Title I Allocation	Max. Req. For School Choice & And SES	# Poverty Children from US Census	Max. Per-Child Exp. For SES
WHITLEY CO	$2,269,908	$453,982	1,525	$1,488
WILLIAMSBURG IND	$537,284	$107,457	301	$1,785
WILLIAMSTOWN IND	$107,776	$21,555	90	$1,198
WOLFE CO	$895,089	$179,018	541	$1,655
WOODFORD CO	$446,707	$89,341	488	$915

Title I School Improvement Funds for 2006-07

Kentucky must reserve 4% of its total Title I, Part A allocation for school improvement; 95% of the 4% must be allocated to districts that have Title I schools in need of improvement, corrective action, or restructuring. Tier 1 and Tier 2 schools are identified for improvement; Tier 3 schools are identified for corrective action, and Tier 4 and Tier 5 schools are identified for restructuring.

Use of Title I School Improvement Funds

1. Each district receiving Title I school improvement funds must ensure that each Title I school identified for improvement, corrective action, or restructuring is provided the resources necessary to meet its goals outlined in the comprehensive school improvement plan.
2. More specifically, the district may use the funding to meet school improvement requirements, including the student transfer option and supplemental educational services.
3. The district must use the funds for school improvement activities at the identified schools, including strategies to eliminate the achievement gap in subpopulations of economically disadvantaged students, students from major racial and ethnic groups, students with disabilities, and students with limited English proficiency.
4. The use of funds should be based on recommendations in the scholastic audit, review, or self-study for the identified schools. The district may require the identified school to undergo a self-study directed by the district.
5. The district may require that the identified school implement a comprehensive school reform model as a part of its school improvement plan. Adopting a comprehensive reform model can be an effective strategy, especially if the school in improvement is in search of an external structure and technical assistance that will help it identify and address organizational and instructional issues. However, a model alone cannot address all of the identified needs of a school and cannot substitute for a coherent plan for systemic change.
6. If there is more than one identified school in the district, the district may combine the funds to be used for the identified schools. The district should retain control of the funds to ensure that the most effective school improvement strategies are being implemented.
7. The district should collaborate with school councils and staffs to ensure buy-in and reform at the school level. Final decisions on expenditures are made at the district level.
8. Funds may **not** be used for administrative costs because the district administers school improvement as a part of Title I. Indirect costs may **not** be charged toward the grant. A district may **not** count administrative costs incurred in providing transportation for the option to transfer or supplemental educational services toward the 20 percent requirements.

Other Information about Title I School Improvement Funds

1. **Award Notification** – Each district with Title I schools identified for improvement, corrective action or restructuring receives an Award Notification with the allocation for the 2006-07

school year. The Title I school improvement funds are available from July 1, 2006 – September 30, 2008. However, funds should be expended during the 2006-07 school year, including summer activities. Costs for supplemental educational services and transportation for the option to transfer should be the priority for Title I school improvement funds.

2. **Method of Payment** – MUNIS expenditure reports are submitted quarterly. The first expenditure report serves as the budget for Title I school improvement funds. Cash draw-downs are made on the federal cash request form. The MUNIS Project Number is 3207 for the Title I school improvement funds for 2006-07.

Resources about School Improvement

1. For questions about **adequate yearly progress (AYP)**, contact the KDE Division of Assessment Support at (502) 564-4394.
2. For questions about the **consequences of school improvement**, contact the KDE Division of Federal Programs and Instructional Equity at (502) 564-3791.
3. For information about **supplemental educational services (SES) in Kentucky** including the approved provider list and a toolkit about SES with sample letters, agreement, etc., refer to the Kentucky Department of Education's website at http://www.education.ky.gov/. In the Search box, type in SES to find the page on supplemental educational services.
4. For the book series on **implementation of school choice and SES**, refer to the U.S. Department of Education's website at http://www.ed.gov/about/pubs/intro/innovations.html
5. For an online **toolkit about school choice** refer to www.buidlingchoice.org
6. For the ***SES in Action Toolkit*** developed by the Supplemental Education Services Quality Center to help parents and community leaders understand SES, call 1-866-544-8686 or send an email to tutorsforkids@air.org to order a free copy. For a PDF version of the *Toolkit*, refer to http://www.tutorsforkids.org/ToolkitDownload2.asp
7. For information about **school improvement**, refer to The Center for Comprehensive School Reform and Improvement's website at www.centerforcsri.org.
8. For information about **closing achievement gaps**, refer to The Education Trust's website at http://www2.edtrust.org/edtrust/.
9. For information about **self-assessment and continuous improvement activities tools**, refer to WestEd's website at http://www.wested.org/cs/we/view/pj/204
10. To assist teachers, administrators, schools, and parents with **mathematics**, the National Council of Teachers of Mathematics (NCTM) offers a collection of resources available at http://www.nctm.org/Titlei/
11. For information about **school improvement efforts at the district level**, refer to the Support for School Improvement, the free monthly e-newsletter of the CCSSO Consortium for School Improvement (CSI). The PDF version of the newsletter is available at http://www.ccsso.org/whats_new/newsletters/Support_for_School_Improvement/index.cfm
12. For guidance in selecting **alternative forms of governance and restructuring**, refer to Dennis Fox's *Look Before You Leap: Responding Effectively to Program Improvement Year 4 Requirements* at www.bayregionssc.org/docs/look_before_you_leap.pdf
13. For findings about the most **commonly employed school improvement strategies**, refer to the Center on Education Policy's *From the Capital to the Classroom: Year 4 of the No Child Left Behind Act* at http://www.cep-dc.org/nclb/Year4/CEP-NCLB-Report-4.pdf

TITLE I DISTRICT IMPROVEMENT UNDER NCLB

NCLB Title I, Part A, Sections 1111 and 1116

TITLE I DISTRICT IMPROVEMENT UNDER NCLB FOR 2006-07

NCLB Title I, Part A, Sections 1111 and 1116

As part of the *No Child Left Behind Act of 2001* (NCLB), states must use academic assessments and other indicators to annually review the progress of each district to determine whether the district makes adequate yearly progress. The document contains information about the NCLB consequences for Title I districts that do not make adequate yearly progress. This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *LEA and School Improvement,* that may be found at **http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln**.

All students that have been enrolled in the district for a full academic year are counted in the district AYP determination. The district is accountable based on the same measures used to determine if a school made AYP. Tested subpopulations of students that are not large enough to meet the minimum group size at an individual school will, in many cases, reach or surpass that number at the district level and be included in the calculation of whether or not the district made adequate yearly progress. Therefore, it is possible for a district to be identified for improvement under NCLB but have no Title I schools identified in need of improvement, corrective action, or restructuring.

NCLB CONSEQUENCES FOR TITLE I DISTRICTS NOT MAKING AYP

Tier 1 of Consequences = District that has not made AYP for 2 **consecutive** years is identified for improvement. Tier 1 consequences include the following:

- **Revised Comprehensive District Improvement Plan** – The identified district must revise its comprehensive improvement plan to improve student achievement throughout the district.
- **Funds for Professional Development** – The identified district must annually spend at least 10% of the Title I district allocation on professional development.
- **Parent Notification** – The state provides districts with information to promptly notify the parents of each student enrolled in the schools in that district.

Tier 2 of Consequences = District that has not made AYP for 3 years continues to be identified for improvement (Tier 2). The 3 years do not have to be consecutive. Tier 2 includes all of the consequences listed in Tier 1 with no additional consequences.

Tier 3 of Consequences = District that has not made AYP for 4 years is identified for corrective action. The 4 years do not have to be consecutive. Tier 3 includes all of the consequences listed in Tier 1 and the following:

- **Corrective Action** – The state must take corrective action toward a district in Tier 3.

The consequences continue until the district has made AYP for 2 **consecutive** years.

District Responsibilities for a District in Tier 1 Consequences

Revisions to the Comprehensive District Improvement Plan

A district identified for Tier 1 consequences must revise its comprehensive district improvement plan no later than three months after the identification and implement the plan as soon as possible. The district must consult with parents, school staff, and others in the development of the plan. The purpose of the plan is to improve student achievement throughout the district. Therefore, the plan overall must identify actions that have the greatest likelihood of accomplishing this goal. Improving the centralized leadership structure of a district is complex. The improvement plan must analyze and address district insufficiencies as they relate to

leadership for schools, governance and fiscal infrastructures, and curriculum and instruction. Specifically, the plan must:

1. Address the fundamental teaching and learning needs of schools in the district, especially the academic problems of low-achieving students;
2. Define specific measurable achievement goals and targets for each of the student subgroups whose disaggregated results are included on the NCLB Report;
3. Incorporate strategies grounded in scientifically based research that will strengthen instruction in core academic subjects;
4. Include, as appropriate, student learning activities before school, after school, during the summer, and during any extension of the school year;
5. Provide for high-quality professional development for instructional staff that focuses primarily on improved instruction;
6. Include strategies to promote effective parental involvement in the schools served by the district; and
7. Include a determination of why the district's previous plan did not bring about increased student academic achievement.

Funds for Professional Development at the District Level

When a district is identified for Tier 1 consequences, it must reserve at least 10% of its Title I, Part A allocation for professional development for instructional staff across the district. The professional development is to be specifically designed to improve classroom teaching. In determining how to use these funds, the district should examine the needs of all of its schools, not just the ones that failed to make AYP. A 12 month timeline should be set to expend the funds. The district must continue to reserve and use these funds for professional development for each fiscal year it is identified for improvement. In this 10% total the district may:

1. Include the Title I, Part A funds that a school within the district reserves for professional development when it is identified for improvement.
2. Not include in the total any part of the funds designated to help teachers meet qualification requirements.
3. Count portion devoted to professional development of Title I funded curriculum/instructional coach.

State Responsibilities for a District in Tier 1 Consequences

Notification to Parents

When a district is identified for Tier 1 consequences, the Kentucky Department of Education provides districts with information to promptly notify the parents of each student enrolled in the schools served by that district. The notification:

1. Must explain the reasons for the identification and how parents can participate in improving the district.
2. May include a link to the district NCLB report on the KDE website instead of attaching the report.
3. Should include a contact name for the district.
4. May be mailed or emailed directly to parents and also placed on the district website, the media, or public agencies serving the student population and their families. Many districts send the notification by way of the students (back pack letters) and include the notification in school newsletters instead of through the mail.

Technical Assistance

If requested, the Kentucky Department of Education must provide technical assistance to a district identified for Tier 1 consequences. The technical assistance is to help the district:

1. Develop and implement its required plan;
2. Work more effectively with its schools identified for improvement; and
3. Address problems the district may have with implementing parental involvement measures and providing high-quality professional development.

District Responsibilities for a District in Tier 2 Consequences

The district must continue all of the consequences in Tier 1. There are no additional consequences for a Tier 2 district. The district must continue to:

1. Review and implement the revisions in its comprehensive improvement plan.
2. Spend at least 10% of its Title I district allocation for professional development for each fiscal year that the district is in improvement.

State Responsibilities for a District in Tier 2 Consequences

There are no additional consequences from the Kentucky Department of Education for a Tier 2 district.

1. Parents must be notified annually of the progress made by the district.
2. Since this is the second year of improvement, the district may include in the notification information about programs/ activities/ professional development/ etc. that the district has put into place to assist in improving instruction throughout the district.

District Responsibilities for a District in Tier 3 Consequences

The district must continue all of the consequences in Tier 1. The district must continue to:

1. Spend at least 10% of its Title I district allocation for professional development for each fiscal year that the district is in improvement.

Revisions to the Comprehensive District Improvement Plan

A district identified for Tier 3 corrective action must revise its comprehensive district improvement plan no later than three months after the identification. The district must consult with parents, school staff, and others in the development of the plan. The purpose of the plan is to improve student achievement throughout the district. The plan must be submitted to the Kentucky Department of Education for review and approval. The plan must be implemented as soon as possible after approval has been given. The plan must specify how deferred funds will be used. (See *State Responsibilities for a District in Tier 3 Consequences*.) The plan must:

1. Address the fundamental teaching and learning needs of schools in the district, especially the academic problems of low-achieving students;
2. Define specific measurable achievement goals and targets for each of the student subgroups whose disaggregated results are included on the NCLB Report;
3. Incorporate strategies grounded in scientifically based research that will strengthen instruction in core academic subjects;
4. Include, as appropriate, student learning activities before school, after school, during the summer, and during any extension of the school year;
5. Provide for high-quality professional development for instructional staff that focuses primarily on improved instruction;

6. Include strategies to promote effective parental involvement in the schools served by the district; and
7. Include a determination of why the district's previous plan did not bring about increased student academic achievement.

State Responsibilities for a District in Tier 3 Consequences

Parents must be notified annually of the progress made by the district. The district must notify parents that the district is identified for corrective action under NCLB.

Corrective Action Toward Tier 3 Districts

Corrective action is the collective name given to steps taken by the state that substantially and directly respond to serious instructional, managerial, and organizational problems in the district that jeopardize the likelihood that students will achieve proficiency in the core academic subjects of reading and mathematics. As required by NCLB, the Kentucky Department of Education (KDE) must take corrective action in a district that has not made AYP for four years (Tier 3 districts). The state must provide technical assistance while instituting the corrective action. A district may select or be selected for one of these:

- Voluntary Partnership Assistance Team (VPAT) – A five-member team (with representatives from KDE, Kentucky Association of School Superintendents and Kentucky School Board Association) will support the district in implementing the improvement plan.
- State Assistance Team (SAT) – KDE cross-agency staff will support the district in implementing the improvement plan.
- Network Assistance Team (NAT) – The district will participate in a network proven effective in improving student achievement and building leadership capacity for support in implementing the improvement plan.

Deferring Title I, Part A Funds in Tier 3 Districts

The KDE will require Tier 3 districts to defer Title I, Part A funds, which may be used to support the work generated from the assistance team and the district improvement plan. The following chart explains the formula used to determine the amount of Title I, Part A funds to be deferred as a corrective action taken by the state. The formula starts with a percentage of the Title I allocation based on the percent of AYP targets missed by the district (number of targets missed divided by the number of targets for the district) on the NCLB Report. An additional amount ($5,000 - $9,000) is added to the formula based on the district's enrollment.

Amount of Title I, Part A District Funds to be Deferred	
Targets missed on 2006 NCLB Report = % of Title I district allocation:	District enrollment = additional amount from Title I district allocation:
<10% = .1%	<2000 = + $5,000
>10% <16% = .2%	>2000 <5000 = + $6,000
>16% <25% = .3%	>5000 <8000 = + $7,000
>25% <50% = .4%	>8000 < 14000 = + $8,000
>50% = .5%	>14000 = +9,000

DISTRICT IMPR

The following chart shows the specific amount that will be deferred for the Tier 2 districts should they move to Tier 3 status. The chart is based on 2005 NCLB Reports and the 2005-06 Title I, Part A district allocation. When new data becomes available, the amounts will be recalculated based on:

- The percent of AYP targets missed on the 2006 NCLB Report; and
- The 2006-07 Title I, Part A district allocation.

(Possible) Tier 3 Districts and Title I Amount Deferred								
District	# 2005 AYP Targets Missed	# 2005 AYP Targets	% 2005 AYP Targets Missed	2005-06 Title I, Part A Allocation	Amt Based on % Targets Missed	District Enrollment	Amt Based on Enrollment	TOTAL TITLE I DEFERRED (Targets + Enroll)
Adair Co	2	13	15.38%	$1,073,532	$2,147	2,662	$6,000	$8,147
Allen Co	3	13	23.08%	$746,044	$2,238	3,023	$6,000	$8,238
Augusta Ind.	1	7	14.29%	$68,230	$136	292	$5,000	$5,136
Barren Co	2	13	15.38%	$815,933	$1,632	4,245	$6,000	$7,632
Bath Co	1	10	10.00%	$632,335	$1,265	1,985	$5,000	$6,265
Bell Co	2	13	15.38%	$1,701,176	$3,402	3,108	$6,000	$9,402
Bourbon Co	1	13	7.69%	$464,775	$465	2,652	$6,000	$6,465
Boyd Co	2	13	15.38%	$720,234	$1,440	3,362	$6,000	$7,440
Breathitt Co	5	13	38.46%	$1,418,817	$5,675	2,197	$6,000	$11,675
Bullitt Co	4	13	30.77%	$1,289,101	$5,156	11,844	$8,000	$13,156
Campbell Co	2	13	15.38%	$240,697	$481	4,806	$6,000	$6,481
Carroll Co	2	13	15.38%	$397,704	$795	1,778	$5,000	$5,795
Carter Co	3	13	23.08%	$1,721,286	$5,164	4,865	$6,000	$11,164
Casey Co	1	13	7.69%	$1,132,164	$1,132	2,414	$6,000	$7,132
Christian Co	6	16	37.50%	$3,369,748	$13,479	9,058	$8,000	$21,479
Clark Co	3	16	18.75%	$1,191,184	$3,574	5,437	$7,000	$10,574
Cloverport Ind.	2	7	28.57%	$77,895	$312	308	$5,000	$5,312
Covington Ind.	9	16	56.25%	$2,505,486	$12,527	3,847	$6,000	$18,527
Cumberland Co	2	10	20.00%	$453,247	$1,360	1,111	$5,000	$6,360
Danville Ind.	3	16	18.75%	$475,168	$1,426	1,770	$5,000	$6,426
Fayette Co	9	16	56.25%	$8,251,330	$41,257	33,887	$9,000	$50,257
Fleming Co	3	13	23.08%	$754,022	$2,262	2,420	$6,000	$8,262
Fulton Co	3	13	23.08%	$337,454	$1,012	661	$5,000	$6,012
Gallatin Co	5	10	50.00%	$341,642	$1,708	1,556	$5,000	$6,708
Grayson Co	2	13	15.38%	$1,223,816	$2,448	4,179	$6,000	$8,448
Green Co	1	13	7.69%	$537,350	$537	1,601	$5,000	$5,537
Hardin Co	4	22	18.18%	$2,919,360	$8,758	13,498	$8,000	$16,758
Henderson Co	3	16	18.75%	$1,459,758	$4,379	6,897	$7,000	$11,379
Jefferson Co	6	25	24.00%	$29,796,464	$89,389	92,200	$9,000	$98,389
Jessamine Co	2	16	12.50%	$1,442,188	$2,884	7,140	$7,000	$9,884
Knott Co	3	13	23.08%	$1,427,346	$4,282	2,602	$6,000	$10,282
Knox Co	6	13	46.15%	$2,772,415	$11,090	4,797	$6,000	$17,090
LaRue Co	2	13	15.38%	$581,630	$1,163	2,421	$6,000	$7,163
Laurel Co	2	13	15.38%	$3,049,059	$6,098	9,008	$8,000	$14,098
Lawrence Co	5	13	38.46%	$1,162,621	$4,650	2,577	$6,000	$10,650
Leslie Co	4	13	30.77%	$1,064,159	$4,257	1,959	$5,000	$9,257
Letcher Co	4	13	30.77%	$1,339,642	$5,359	3,320	$6,000	$11,359
Lincoln Co	2	13	15.38%	$1,353,184	$2,706	4,180	$6,000	$8,706
Madison Co	4	16	25.00%	$2,342,039	$9,368	10,110	$8,000	$17,368
Martin Co	5	13	38.46%	$1,180,994	$4,724	2,256	$6,000	$10,724

(Possible) Tier 3 Districts and Title I Amount Deferred								
District	# 2005 AYP Targets Missed	# 2005 AYP Targets	% 2005 AYP Targets Missed	2005-06 Title I, Part A Allocation	Amt Based on % Targets Missed	District Enrollment	Amt Based on Enrollment	TOTAL TITLE I DEFERRED (Targets + Enroll)
Monroe Co	3	13	23.08%	$752,092	$2,256	2,032	$6,000	$8,256
Pendleton Co	1	13	7.69%	$474,019	$474	2,776	$6,000	$6,474
Perry Co	3	13	23.08%	$2,041,786	$6,125	4,287	$6,000	$12,125
Pulaski Co	2	13	15.38%	$2,265,483	$4,531	7,620	$7,000	$11,531
Russellville Ind.	4	13	30.77%	$498,849	$1,995	1,141	$5,000	$6,995
Shelby Co	6	19	31.58%	$751,681	$3,007	5,856	$7,000	$10,007
Simpson Co	2	16	12.50%	$626,335	$1,253	3,047	$6,000	$7,253
Todd Co	2	13	15.38%	$644,713	$1,289	2,001	$6,000	$7,289
Trigg Co	3	16	18.75%	$388,608	$1,166	2,072	$6,000	$7,166
Webster Co	1	13	7.69%	$249,197	$249	1,881	$5,000	$5,249

A Tier 3 district is required to reserve the amount listed on the chart as a part of the district set-asides on the Title I Ranking Report. The funds cannot be expended until the district plan has been developed and approved. At that time funds must be expended for implementation of the plan during the 2006-07 school year (including summer).

Other funds must also be used to implement the revisions in the district plan. The 10% of the district Title I allocation for professional development must be directed toward identified needs and used to improve teaching across the district. If a “team leader” is needed to facilitate the interventions for the district, the portion devoted to professional development may be counted toward the 10% requirement. If the district has participated in Title VI (Rural Low-Income Schools Program or Small Rural Schools Achievement Program) for three years and is identified for corrective action, the district must spend all of its Title VI funds for improvement activities. Title V funds (Innovative Programs) may be used for improvement activities. **The district must assume the full cost of funding the revisions to the district plan.**

A district exits from corrective action status when it makes adequate yearly progress (AYP) for two (2) consecutive years following its identification for corrective action. If a district fails to make AYP after one (1) year of being identified for corrective action, the KDE may defer additional Title I, Part A funds or reduce the amount of funds that may be used for district administrative costs.

PARAEDUCATORS

Title I, Part A, NCLB Section 1119

PARAEDUCATORS

Title I, Part A, NCLB Section 1119

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Title I Paraprofessionals* that may be found at <**http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.**

For the purpose of Title I Part A, a paraeducator is an employee who provides instructional support in a program supported with Title I, Part A Funds. Paraeducators are vital team members in the delivery of instructional and other services to students. Unfortunately, studies often show that paraeducators are used for assisting in teaching although their educational backgrounds may not qualify them for such responsibilities. The *No Child Left Behind Act* (NCLB) includes higher standards to ensure that students who need the most help are assisted by highly qualified paraeducators. The law also requires that high quality and ongoing professional development be provided for paraeduators working in programs supported by Title I, Part A funds. The training should enable paraeduators to assist children in meeting Kentucky's student academic achievement standards.

The *No Child Left Behind Act* (NCLB) addresses educational qualifying factors for paraeducators. Specifically, **all** paraeducators working in a program supported with Title I, Part A funds must have a secondary school diploma or its recognized equivalent. New employees must also meet the NCLB educational requirement listed below before they are hired to provide instructional support in a program supported with Title I, Part A funds. Paraeducators hired **on or before** January 8, 2002 and whose duties include instructional support in a program supported with Title I, Part A funds must have met the NCLB educational requirement listed below by the end of the 2005-06 school year.

No Child Left Behind (NCLB) Requirements

Paraeducators whose duties include instructional support and who work in a program supported with Title I, Part A funds must meet the NCLB educational requirement through **one** of the following:

1. Completed two years of study at an institution of higher education; **or**
2. Obtained an associate's (or higher) degree; **or**
3. Met a rigorous standard of quality and be able to demonstrate, through a formal State or local academic assessment, knowledge of and the ability to assist in instructing reading, writing, and mathematics (or as appropriate reading readiness, writing readiness, and mathematics readiness).

The following are programs supported with Title I, Part A funds:

1. A **schoolwide program** uses Title I, Part A funds together with federal, state and local funds to upgrade the entire educational program of a school. A school that is served by Title I, Part A and has at least 40 percent of the children from low-income families may be a schoolwide program. Title I funds support all teachers and paraeducators. In a schoolwide program, the educational requirement applies to **all** paraeducators, without regard to whether the positions are funded with federal, state or local funds.
2. A **targeted assistance school** uses Title I, Part A funds only for programs that provide supplemental services to eligible children identified as having the greatest need for special assistance. A school that is served by Title I, Part A and is ineligible or chooses not be to a schoolwide program is a targeted assistance school. In a targeted assistance school, the

educational requirement applies to paraeducators who are paid with Title I, Part A funds, but not to paraeducators paid with state or local funds.

Individuals Required to Meet the NCLB Educational Requirement

According to guidance from the U.S. Department of Education:

1. Paraeducators with instructional duties in any program supported by Title I, Part A funds must meet the NCLB educational requirement. Individuals who have both instructional and non-instructional duties must meet the NCLB educational requirement because they carry out some instructional support duties.
   - For a schoolwide program, **all** paraeducators with instructional duties must meet the NCLB educational requirement without regard to the source of funding of the positions. Paraeducators who provide instructional support to special education students and work in a schoolwide program must meet the NCLB educational requirement without regard to the source of funding that supports the positions.
   - For a targeted assistance school, **only** paraeducators with instructional duties who are paid with Title I, Part A funds must meet the NCLB educational requirement.
2. Paraeducators employed by the district to provide Title I, Part A instructional services to eligible private school students must meet the NCLB educational requirement.
3. Individuals who had been performing non-instructional duties and then become instructional paraeducators must meet the NCLB educational requirement. As existing employees of the district, the individuals would have until the end of the 2005-06 school year to demonstrate competency through post-secondary education or a formal academic assessment.

Individuals Not Required to Meet the NCLB Educational Requirement

According to guidance from the U.S. Department of Education:

1. Paraeducators who are proficient in English and a language other than English and act solely as translators for limited English proficient students are not required to meet the NCLB educational requirement.
2. Pareducators who work as interpreters for the deaf and hard of hearing are not required to meet the NCLB educational requirement.
3. Paraeducators with duties that consist solely of conducting parental involvement activities are not required to meet the NCLB educational requirement.
4. Paraeducators with instructional duties in a targeted assistance school that are funded through state or local funds are not required to meet the NCLB educational requirement.
5. Individuals who work solely in non-instructional roles, such as food service, cafeteria or playground supervision, personal care services, and non-instructional computer assistance are not required to meet the NCLB educational requirement.
6. Individuals who provide non-instructional support to special education students are not required to meet the NCLB educational requirement. This includes individuals who solely provide personal care services or serve as bus or health aides for special education students.
7. Paraeducators paid with funds under Title I, Part B (Student Reading Skills Improvement Grants), Title I, Part C (Education of Migratory Children) or Title I, Part D (Programs for Children and Youth who are Neglected, Delinquent, or At-Risk) are **not** required to meet the NCLB educational requirement unless they work in a schoolwide program school or are paid, in whole or part, with Title I, Part A funds.
8. Individuals working in early childhood programs (such as Head Start or State funded preschool programs) that are physically located in a Title I, Part A school but are not a part of a schoolwide program and are not funded with Title I, Part A funds are **not** required to

meet the NCLB educational requirement. However, the educational requirement would apply to paraeducators working in an early childhood program that is jointly funded with Title I, Part A funds and the paraeducator is paid with Title I, Part A funds.

9. Paraeducators working in schools (or districts) that do not receive Title I, Part A funds are **not** required to meet the NCLB educational requirement.
10. AmeriCorps volunteers and other volunteers are not considered employees of districts and are **not** required to meet the NCLB educational requirement. However, even though the educational requirement does not apply, the district should make every effort to ensure that AmeriCorps volunteers who provide instructional support in a Title I program have the skills necessary to assist effectively in instructing reading, writing and mathematics.
11. Individuals working in 21st Century Community Learning Center Programs are **not** required to meet the NCLB educational requirement. However, the requirement would apply to paraeducators paid with Title I, Part A funds in a 21st Century after-school program funded jointly with Title I funds in a targeted assistance school and to paraeducators working in a 21st Century after-school program that is part of a Title I schoolwide program. The educational requirement does not apply to staff of 21st Century programs that are not employees of the district.

New and Existing Employees

New employees must meet the NCLB educational requirement in order to be hired by the district if their duties include instructional support in a program supported with Title I, Part A funds. Existing employees with instructional duties in a program supported with Title I, Part A funds had until the end of the 2005-06 school year, to meet the educational requirement. Persons that work as paraeducators in a non-Title I program and are then transferred to a Title I, Part A program are **not** considered new employees. A district has discretion to define its policies for distinguishing “new” and “existing” paraeducators in the case of paraeducators hired before January 8, 2002 but laid off and subsequently rehired after January 8, 2002. These policies might say, for example:

1. Paraeducators who are “pink-slipped” at the end of one school year and then rehired at the beginning of the next school year, with the result that they have continuous years of employment, are considered existing paraeducators, not new employees.
2. Individuals who have a break in service and are re-hired at some later point are considered new employees.

To provide consistency and ensure that all paraeducators are highly qualified, districts may choose to develop a policy in which **all** paraeducators with instructional duties are required to meet the NCLB educational requirement.

Two Years of Study and Associate’s Degree

A paraeducator may complete “two years of study at an institution of higher education” to meet the NCLB educational requirement. “Two years of study” means the equivalent of two years of full-time study as defined by the institution. For some institutions that may mean 12 credit hours per semester (requiring a total of 48 credit hours), while in others it may mean 15 credit hours a semester (requiring a total of 60 credit hours). A paraeducator may obtain an associate’s (or higher) degree to meet the NCLB educational requirement. The Kentucky Community and Technical College System (KCTCS) has developed an associate’s degree for paraeducators. While a paraeducator is not required to take a specific course of study, a paraeducator should be able to demonstrate knowledge of and the ability to assist in instructing in the areas of reading, writing, and mathematics or in readiness.

A district may count continuing education credits (CECs) toward the two years of study if the CECs are part of an overall training and development program plan and an institution of higher education accepts or translates them to course credit.

Formal Academic Assessments

For paraeducators who have not completed two years of post-secondary education or have not obtained an associate's degree, a formal state or local academic assessment may be used to meet the NCLB educational requirement. The assessment must assess the paraeducator's knowledge of and the ability to assist in the instruction of reading, writing, and mathematics (or as appropriate reading readiness, writing readiness, and mathematics readiness). The purpose of the academic assessment is to demonstrate that paraeducators have the appropriate knowledge and ability to assist in instructing students and are competent in required instructional techniques and academic content areas.

Allowable Duties for Paraeducators

Paraeducators providing instructional support in a program supported with Title I, Part A funds must work under the **direct supervision** of a teacher. For a schoolwide program, **all** paraeducators with instructional duties must work under the direct supervision of a teacher. For a targeted assistance school, **only** paraeducators with instructional duties who are paid with Title I, Part A funds must work under the direct supervision of a teacher. Direct supervision of a teacher is considered to be:

1. The teacher prepares the lessons and plans the instructional support activities the paraeducator carries out and evaluates the achievement of the students with whom the paraeducator is working; and
2. The paraeducator works in close and frequent proximity with the teacher.

A program where a paraeducator provides instructional support and a teacher visits a site once or twice a week but otherwise is not in the classroom would be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher. A program where a paraeducator works with a group of students in another location while the teacher provides instruction to the rest of the class would also be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher.

Because paraeducators provide instructional support, they should **not** be providing planned direct instruction or introducing to students new skills, concepts or academic content. Paraeducators working in a program supported with Title I, Part A funds may provide the following services, under the supervision of teachers or other licensed personnel:

1. Provide one-on-one tutoring for eligible students, if the tutoring is scheduled at a time when a student would **not** otherwise receive instruction from a teacher;
2. Assist with classroom management such as by organizing instructional materials;
3. Provide instructional assistance in a computer laboratory;
4. Conduct parent involvement activities;
5. Provide instructional support in a library or media center;
6. Act as a translator; **or**
7. Provide instructional services to students under the direct supervision of a highly qualified teacher.

Paraeducators who provide services to eligible private school students and are employed by the district must be under the direct supervision of a highly qualified public school teacher throughout the duration of the services/program being offered.

Paraeducators hired by a third-party contractor to work in a Title I program must work under the direct supervision of a teacher. That teacher does not have to meet the teacher qualification requirement if the third party contractor also employees the teacher.

Paraeducators providing instructional support in a program supported with Title I, Part A funds may assume limited duties that are assigned to similar personnel who are not working in a program supported with Title I, Part A funds. The limited duties include duties beyond classroom instruction or duties that do not benefit participating children. The amount of time spent on limited duties must be the same proportion of total work time as that of instructional staff at the same school.

Funding Professional Development

Several federal programs provide funds that local school districts may use to provide professional development for paraeducators.

1. Title I, Part A funds may be used to support ongoing training and professional development to assist teachers and paraeducators working in a program supported with Title I, Part A funds. Title I, Part A funds may also be used for professional development to help paraeducators become certified and licensed teachers.
2. Title II, Part A (Teacher Quality Program) funds may be used to provide professional development activities that improve the knowledge of teachers and principals and, in appropriate cases, paraeduators concerning effective instructional strategies, methods and skills and use of challenging content standards to improve teaching practices and student academic achievement. Title II-A funds may also be used for professional development to help paraeducators become certified and licensed teachers.
3. Title III, Part A (English Language Acquisition) funds may be used to provide professional development for teachers and other instructional personnel providing instruction to students need English language acquisition and language enhancement.
4. Title V, Part A (Innovative Programs) funds may be used to provide professional development for teachers and other school personnel as a part of reform strategies.

NOTIFICATION TO PARENTS PROFESSIONAL QUALIFICATIONS OF TEACHERS

NCLB Title I, Part A, Sections 1111 and 1119

NOTIFICATION TO PARENTS
PROFESSIONAL QUALIFICATIONS OF TEACHERS

NCLB Title I-A, Sections 1111 and 1119

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Improving Teacher Quality (Title II)* that may be found at <**http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln**>.

At the beginning of each school year, districts must notify parents in Title I schools of their right-to-request information regarding the professional qualifications of their child's teacher(s). Also at the beginning of each school year, Title I schools must monitoring the time in which students are taught by a teacher of a core academic subject who is not "highly qualified." After four consecutive weeks, the school must notify parents. The notice applies for four consecutive weeks at any time during the school year. Each year the principals of Title I schools must certify in writing that the schools are complying with NCLB's mandate for highly qualified teachers.

Districts should determine if the teachers in the district are considered "highly qualified" for the core academic course(s) they teach. The definition of "highly qualified" teacher may be accessed at <http://www.kyepsb.net/NCLB.html>. "Highly qualified" means meeting the following NCLB requirements:

1. Hold at least a bachelor's degree;
2. Hold full Kentucky certification (emergency, probationary and adjunct instructor certifications are not full Kentucky certifications); **AND**
3. Demonstrate competency in each of the core academic subjects taught.

All questions concerning the definition of a "highly qualified" teacher, should be directed to the Education Professional Standards Board; please contact Dr. Phillip Rogers, EPSB, at (502) 564-4606 or (888) 598-7667 or email <Phillip.Rogers@ky.gov>.

District Requirement for Notification to Parents

At the beginning of **each school year**, a district that accepts Title I, Part A funding must notify parents of students in Title I schools that they may **request information** regarding their child's teacher(s). The district must provide the parents on request, information regarding the professional qualifications of the student's teacher(s). The information must include, at a minimum, the following:

1. Whether the teacher has met the state requirements for licensure and certification for the grade levels and subject matters in which the teacher provides instruction;
2. Whether the teacher is teaching under emergency or other provisional status through which state qualification or licensing criteria have been waived;
3. The college major and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree; and
4. Whether your child is provided services by paraeducators, and if so, their qualifications.

The district is only required to notify parents in Title I schools. The district should personalize the notification as much as possible. The district may also include other information such as the number of years of teaching experience. The notification should contain the district contact name, phone number and the procedure to receive information about their child's teachers. The notification to parents may come in the form of the following:

NOTIF TO PARENTS

1. Letter to all parents (on district letterhead from the superintendent or designee);
2. Notification in student handbook that is given to all parents;
3. Prominent article in newsletter that is sent to all parents;
4. Information on district/school web site. (This should be coupled with another method of notification since not all parents have access to computers.)

The district must provide the notification and the information about teacher qualifications:

1. In a timely manner.
2. In a uniform and understandable format, including alternative formats upon request; and
3. To the extent practicable, in a language parents can understand.

An excellent source of sample letters may be found through TransACT. TransACT® No Child Left Behind Parent Communication Center™ (NCLB-PCC) is a comprehensive, Internet-based subscription service providing school administrators, educators and staff with access to letters and forms. This powerful technology tool is designed to help a district meet the *No Child Left Behind Act of 2001* and Office for Civil Rights requirements, enhance multilingual communication and save development time and resources. KDE offers this comprehensive online service to school districts at no cost. The superintendent in each district has information on accessing the sample letters in TransACT.

Sample letters are attached to this document. Personalize the letters to meet the needs of the district.

1. **Notification of Right to Request Teacher Qualification** – This letter notifies parents that they may request information regarding their child's teacher(s).
2. **Teacher Qualification Response to Parents** – This letter is in response to a parent's request for information about their child's teacher(s). Repeat the chart as needed for other teachers. Add other information the district wishes to provide such as the number of years of experience. The letter also contains a general statement about paraeducators in the district. Change this as appropriate.

School Requirement for Notice to Parents

In addition to the district requirement, each Title I school must provide each parent timely **notice** that the parent's child has been assigned, or has been taught for four or more consecutive weeks by, a teacher of a core academic subject **who is not "highly qualified**."

The notice applies to all teachers in core academic subjects, including substitute teachers, who have not met the NCLB requirements. "Core academic subjects" are English; reading or language arts (Kentucky's "reading/writing"); mathematics; science; foreign languages; civics and government (Kentucky's "political science"); economics, history, and geography (all of which fall under Kentucky's social studies"); and arts (Kentucky's "art" and "music"). The academic area in which student credit is assigned determines whether or not a course is a "core academic subject."

The notice should be worded carefully in order to provide information and meet the intent of the law without confusing students, parents and the teacher(s) involved. The federal law and regulations simply state that schools must notify parents; they do not state that parents should be given the choice to move their child to another classroom. A sample **notice of teacher status** is attached to this document. In the notice, the school principal should do the following:

1. Clarify for parents that while the teacher does not meet the NCLB requirements, the teacher does have the skills and experience needed to teach the child.
2. Note that teachers hired before SY 2002-03 have until the end of SY 2006-07 to meet the requirements. Districts that are considered rural under the Small Rural School Achievement (SRSA) program have additional time to meet the requirements.
3. For a substitute teacher, note that he/she is not required to meet the NCLB requirements and that the person does have the credentials to serve as a substitute teacher under Kentucky law.
4. Assure parents that the teacher is involved in training and coursework in order to meet the requirements.
5. Include the school and district name and phone number that a parent may contact to request the qualifications of the teacher.

Sample
Notification of Right to Request Teacher Qualifications

Dear Parent or Guardian:

The educators in _____ County/Independent schools are committed to providing a quality instructional program for your child. This letter is just one of the ways of keeping you informed of the educational commitment of our schools and our district.

Our district receives federal funds for Title I programs as a part of *the No Child Left Behind Act* (NCLB). Under NCLB, you have the right to request information regarding the professional qualifications of your child's teacher(s). If you request this information, the district will provide you with the following:

1. Whether the teacher has met the state requirements for licensure and certification for the grade levels and subject matters in which the teacher provides instruction;
2. Whether the teacher is teaching under emergency or other provisional status through which state qualification or licensing criteria have been waived;
3. The college major and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree; and
4. Whether your child is provided services by paraeducators, and if so, their qualifications.

If you would like to request this information, please contact _____ by phone at _____ or by email at _____. Please include your child's name, the name of the school your child attends, the names of your child's teacher(s) and an address or email address where the information may be sent. Thank you for your interest and involvement in your child's education.

Sincerely,

Superintendent (or Designee)

NOTIF TO PARENTS

Sample
Teacher Qualification Response to Parents

Name of Student _____ Date _____

Dear Parent or Guardian:

Thank you for your recent request for information regarding the professional qualifications of your child's teacher(s). Below is information for your child's teacher(s).

Teacher		Class
Yes	**No**	**Teacher Qualifications**
		1. Has the teacher met the state requirements for licensure and certification for the grade levels and subject matters in which the teacher provides instruction?
		2. Is the teacher teaching under emergency or other provisional status through which state qualification or licensing criteria has been waived?
		3. The college major and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree:

The *No Child Left Behind Act* (NCLB) also requires that you be informed whether your child is provided services by paraeducators and, if so, their qualifications. In our district all paraeducators with instructional duties working in programs supported with Title I funds have passed the Kentucky Paraeducator Assessment; have an associates degree or higher or have completed at least 48 hours of postsecondary education.

Thank you for your interest in the quality of your child's education. Your continued involvement is an important part of your child's academic success. If you have questions about the information that has been provided, please contact me by phone at _____ or by email at _____.

Sincerely,

(Title of person providing information)

NOTIF TO PARENTS

Sample
Notice of Teacher Status

Dear Parent or Guardian,

The federal *No Child Left Behind Act* (NCLB) requires that by the end of SY 2006-07, teachers who teach core academic subjects meet the following requirements:

1. Hold at least a bachelor's degree;
2. Hold full Kentucky certification; and
3. Demonstrate competency in each of the core academic subjects taught.

Schools are required to notify parents if a teacher who does not meet the NCLB requirements has taught their child for four or more consecutive weeks. This notice applies to all teachers in core academic subjects in Title I schools. The core academic subjects are English, reading/writing, mathematics, science, foreign languages, political science, social studies, art and music. Even though a substitute teacher is not required to meet NCLB requirements and does have the credentials to serve as a substitute teacher under Kentucky law, the substitute must still be included in the notice to parents.

The following teacher(s) who teach your child do not currently meet the NCLB requirements.

Teacher	Course Taught	NCLB Requirement(s) Not Met

These teachers do have the skills and experience to teach your child; they simply do not meet the NCLB requirements. Keep in mind that these teachers have until the end of the 2006-07 school year to meet the requirements. These teachers are involved in training and/or coursework to satisfy the requirements.

Please contact me by phone at _____ or by email at _____ if you have any questions about this letter. Please contact _____ by phone at _____ or by email at _____ to request the specific qualifications of these teachers.

Sincerely,

Principal

HOMELESS EDUCATION

NCLB, Title X, Part C

HOMELESS EDUCATION

NCLB, Title X, Part C

The Stewart B. McKinney-Vento Homeless Assistance Act was the first and remains the only major federal legislative response to homelessness. This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Education for Homeless Children and Youth Program* that may be found at <**http://www.ed.gov/programs/homeless/legislation.html?exp=0>.**

Purpose of Homeless Education

Homeless children and youth are to be provided services comparable to those received by other students. The services include transportation services and education programs for which students meet eligibility criteria. These school services may include those provided under Title I or similar state or local programs; programs for students with disabilities; programs for students with limited English proficiency; vocational or technical programs; gifted and talented programs; school nutrition programs; and transportation.

The Kentucky Department of Education (KDE) has identified approximately 8000 homeless children. The mission of the Homeless Education Program of the KDE is to be a supporter and nurturer of homeless children and youth; to help them achieve educational success and to prepare them for the challenges of adult life.

The Homeless Education Program includes competitive grants. Schools awarded the Stewart B. McKinney-Vento Assistance Act include the following school districts: Ashland, Bell, Boyd, Carter, Christian, Clark, Covington, Fairview, Fulton Co., Greenup, Hopkins, Jefferson, Kenton, McCracken, Paducah, Pike, Rowan, and Whitley. The grants are awarded on a three-year cycle beginning July 1, 2003.

Definitions

Enroll and Enrollment: include attending classes and participating fully in school activities.

Unaccompanied Youth: includes a youth not in the physical custody of a parent or guardian.

School of Origin: the school the child or youth attended when permanently housed, or the school in which the child or youth was last enrolled.

Dispute Resolution: a process or procedure that the parents or unaccompanied youth can use to resolve problems involving educational placement of homeless children/youth.

Records: any information or documentation ordinarily kept by the school such as immunization, medical records, birth certificates, guardianship papers, academic records and evaluations for special services or programs.

Placement Choice: decision for placement is made regardless of whether the child is living with the homeless parents, or has been temporarily placed elsewhere.

Homeless children or youth are defined as individuals ages three (3) to twenty-one (21) that lack a fixed, regular, and adequate nighttime residence. The term includes:

1. Children and youth who are:
   - Sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as *doubled-up*);
   - Living in motels, hotels, (camping) trailer parks, or camping grounds due to lack of alternative adequate accommodations;
   - Living in emergency or transitional shelters;

- Abandoned in hospitals; or
- Awaiting foster care placement;

2. Children and youth who have a primary nighttime residence this is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings;
3. Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
4. Migratory children or youth who qualify as homeless because they are living in circumstances described above.

Identifying Homeless Preschoolers

Local liaisons can identify preschool-aged homeless children by working closely with shelters and social service agencies in their area. In addition, the liaison should work with school personnel, who can inquire, at the time they are enrolling homeless children and youth in school, whether the family has preschool-aged children. The district liaison should also collaborate with the school district special education program. The Individual with Disabilities Education Act (IDEA) requires that highly mobile children with disabilities, such as migrant and homeless children who are in need of special education and related services, are located, identified and evaluated. Additionally, IDEA requires that homeless preschoolers and all children be included in the “Child Find” process for early identification of special education needs.

The district liaison should work with preschool program staff to remind them how important their services are for homeless children and to inform them of how waiting lists often create barriers for homeless families who wish to enroll their children. Some preschool programs keep slots open specifically for homeless children.

Enrollment and Attendance Statistics

The FY 2000 Report to Congress stated that 87 percent of homeless K-12 children and youth are enrolled in school. However, only 77 percent attended school regularly. Less than 16 percent of eligible preschool aged children are enrolled in preschool programs.

U.S. Department of Education’s McKinney-Veto Report to Congress or Fiscal Year 2000 References, Appendix G

District Requirements

1. The district must meet all federal requirements regardless of whether they receive McKinney-Vento Grant monies or not.
2. The district must set-aside monies for homeless students on the Title I Ranking Report for homeless students in non-Title I schools.
3. A district receiving Stewart B. McKinney-Vento Grant must set-aside Title I, Part A, funds. These funds must be reflected in the Title I Ranking Report.
4. The district must designate an appropriate staff person to serve as the liaison for homeless children and youth. The liaison may have other duties that include but are not limited to coordinating other federal programs.
5. The district must ensure that homeless children and youth are identified by school personnel and through other entities and agencies.

6. The district is to inform parents or guardians of educational and related opportunities available to their children and must provide them with meaningful opportunities to participate in the education of their children.
7. The district must mediate all enrollment disputes in accordance with the enrollment disputes provision.
8. The district must assist unaccompanied youth in placement/enrollment decisions, consider the youth's wishes in these decisions, and inform the youth of the right to appeal such decisions under the enrollment disputes provision.
9. The district must immediately enroll unaccompanied youth in school, even if there is a dispute over school enrollment or placement.
10. The district must assist children and youth in obtaining necessary immunizations or medical records.
11. The district must collaborate and coordinate with state coordinators, community and school personnel, who are responsible for the provision of education and related services to homeless children and youth.
12. The district must fully inform the parent/guardian of a homeless child/youth or any unaccompanied youth of all transportation services available, including transportation to the school of origin.
13. The district must ensure that the school selected for attendance immediately enrolls the child/youth in school, even if the he or she lacks records normally required for enrollment. Such records include the previous academic records, medical records, proof of residency, or other documentation.
14. The district must immediately contact the last school attended to obtain relevant academic and other records.
15. The district must keep records normally kept by the school. These records include immunization or medical records, academic records, birth certificates, guardianship records, and evaluations for special services or programs. These records must be available in a timely fashion, when a child/youth enters a new school district and in a manner consistent with the Family Educational Rights Privacy Act of 1974.
16. At the request of the parent/guardian, the district must ensure that transportation is provided to and from the school of origin. In the case of an unaccompanied youth, the liaison may request this service.
17. If the homeless student moves to another school district but continues to attend the school of origin, both districts must decide which district is responsible for transportation costs to the school of origin. If the districts cannot agree, they must share costs and responsibilities equally.
18. The district may use funds for professional development to heighten awareness of the plight of homeless children for his/herself and school employees.
19. Under the school nutrition program homeless children are automatically eligible for free and reduced lunch.

Title I and Homeless Children and Youth

NCLB, Title I, Part A, Section 1114, 1115, 1118

The following are key provisions in Title I, Part A, relating to homelessness:

- It targets those students most at risk of failing in school.
- A homeless child/youth attending any school in the district is eligible for Title I services.

- Districts must set-aside funds to provide comparable services to children attending schools not served by Title I, Part A, including providing educationally related support services to children in shelters and other locations where children may live.
- Each district Title I coordinator must include a description on the Title I Ranking Report of the services that will be provided to homeless children.
- Children/youth who are in homeless situations benefit from Title I services and programs. However, additional Title I funds may be needed to address specific needs of children who are homeless or highly mobile. For example, an excellent reading program implemented in a schoolwide or targeted assistance school will not be effective for children/youth who are unable to attend school regularly. An appropriate expenditure of Title I funds would be to remove barriers that prevent regular attendance or provide additional support, such as tutorial, before and after school and/or summer school programs. Funds other than those set-aside by Title I, Part A, must be used to provide transportation to school of origin.
- District homeless liaisons, are now required to be appointed in every school district, and district Title I coordinators must communicate and collaborate on an ongoing basis with the liaison to identify the needs of homeless children/youth, review resources, and plan ways to address needs.

The National Center for Homeless Education at SERVE provided the following strategies for using Title I, Part A, funds for students experiencing homelessness. These strategies are **suggestions** that may be helpful in addressing the needs of homeless students.

- Establish a formula to allocate Title I set-asides for homeless children/youth.
- Use Title I funds (including set-aside funds) to support the position of a full-time LEA homeless liaison so that the liaison's duties can be more fully accomplished.
- Use Title I funds to meet basic needs of students experiencing homelessness (clothing, supplies, health) so that they may participate more fully in school.
- Use Title I funds for parent involvement that makes a special effort to reach out to parents in homeless situations.
- Use set-aside funds for after school and/or summer programs.
- Use set-aside funds for outreach services to children/youth living in shelters, transitional living programs, motels, and other temporary residences.
- Use Title I funds for research based programs that benefit highly mobile students.
- Collect data on students experiencing homelessness as part of the overall district-wide data collection system.
- Coordinate Title I and Stewart B. McKinney-Vento funds to provide a comprehensive program for children at risk of failure, ensuring that specific needs of children experiencing homelessness or high mobility are met.

Strategies to facilitate collaboration and coordination between Title I, Part A, and Stewart B. McKinney-Vento include the following. These strategies are suggestions that may be helpful in addressing the needs of homeless students.

- Ensure that district homeless liaisons attend Title I conferences and professional development and that Title I coordinators attend homeless education conferences and in-service
- Share Title I and Homeless Education handbooks with each program.
- Collect and share across the district concrete data on the needs of homeless children/youth.

- Involve Title I coordinators in structured coalition building with homeless education programs and organizations that serve homeless families and unaccompanied homeless youth, and establish common goals.
- Initiate district efforts to make accommodations for homeless children/youth as necessary in such areas as transportation, remaining in the school of origin, records transfer, class scheduling, and special services that will help them enroll, attend, and succeed in school.
- Involve homeless education program staff in school improvement issues; make sure that addressing the needs of highly mobile students is included in the Comprehensive School Improvement Plans, not addressed as a separate issue.
- Emphasize that coordination and sharing of resources is beneficial to the district as a whole because serving homeless children/youth will increase school achievement, lower truancy and dropout rates, and increase overall funding to the district.
- Determine what funding is available to serve homeless children/youth and how it is being used. Identify needs and develop a cross-program approach to address unmet needs.
- Establish and widely disseminate information on district-wide policies, procedures, and guidelines to identify and serve homeless children/youth.
- Ensure district homeless liaison representation on the appropriate district planning committee.
- Include homeless parents in Title I parental involvement policies and create opportunities for homeless parents to be involved.

Websites – Addressing Homelessness

The following websites contain resources that may be useful to districts and schools in developing and implementing plans to address homelessness:

U.S. Interagency Council on Homelessness www.ich.gov
This site contains state and local information on mainstream resources available to assist people who are homeless. News and updates, a library of resources, a phone list of clearinghouses, and links to member organizations and other helpful sites are also available.

National Alliance to End Homelessness www.naeh.org
This site includes statistics, policy and legislative information, publications, best practices and profiles, fact sheets, links, and other resources on homelessness.

National Health Care for the Homeless Council www.nhchc.org
This site has a policy and advocacy section which provides several papers and legislative updates online. Other sections include research, clinical resources, training and education, and publications such as newsletters and fact sheets.

National Law Center on Homelessness and Poverty **www.nlchp.org**
This site includes fact sheets on housing, health, and quality of life issues. It also provides a list of its publications and links to other sites.

Technical Assistance Collaborative www.tacinc.org
This site provides information on a full range of federal and mainstream housing programs and policies. These programs expand on affordable housing for people with disabilities and who may be homeless. The site also features a newsletter and links to other sites.

Corporation for Supportive Housing www.csh.org
This site includes links to local programs, a legislative action center, a resource page, and a contacts list. Publications and information on supportive housing initiatives are available online as well.

LOCAL NEGLECTED INSTITUTIONS

NCLB Title I, Part A, Section 1113

TITLE I SERVICES TO CHILDREN IN LOCAL INSTITUTIONS FOR NEGLECTED CHILDREN

NCLB Title I, Part A, Section 1113

1. **Requirement** – A district must provide for the educational needs of children in identified local institutions for neglected children. **See attached list to determine the locations of the institutions for neglected children.**
2. **Definition** – Children who reside in a local institution for neglected children are counted as eligible formula children in the Title I, Part A allocation. The Cabinet for Families and Children identifies the institutions and their numbers of formula children, based on a child count taken in October. The children in these institutions must receive some type of Title I educational service. Any local institution for neglected children not included in the count may also be served at the discretion of the DISTRICT. **A local institution for neglected children is <u>not</u> considered a private school.**
3. **Funds** – The amount of funds generated by children in local institutions for neglected children becomes a part of the Title I, Part A allocation. Before allocating funds to public schools, a district should consult with officials from the identified institutions and then reserve funds that are reasonable and necessary to serve children in local institutions for neglected children and those neglected children who are in community day school programs. Services should be comparable to those provided to children in participating Title I schools. If there is more than one institution in the district, the needs of each institution's educational program should be considered in determining the amount of funds for services to each institution. The number of children that reside in each institution on an average basis may also be used in determining the amount of funds to be expended for services to a particular institution.
4. **Consultation** – The district must consult with officials from the institution(s) to determine the type of services, including conducting a needs assessment. **Documentation must be on file in the district Title I office that demonstrates institution officials are being consulted in a timely manner and on-going.**
5. **Services** – Services are provided to any children residing in a local institution for neglected children. Particular children are **not** identified for services since these children are very mobile. The chart in the Title I Ranking Report showing the districts set-asides must contain a brief description of Title I educational services for children in local institutions for neglected children and neglected children in community day school programs. A needs assessment must be conducted to determine Title I services. Many students in the institution are served by Title I in the public schools they attend. The following are examples of Title I services that may be provided to children in the institution.
   - Tutors work with students in addition to the assistance being provided to children who are attending public schools and receiving Title I services.
   - Counseling/peer mediation services help children in the transition from the institution to school.
   - Computers and software assist children with homework, reinforce concepts, etc.
   - Books and materials such as encyclopedias, dictionaries, high interest/low vocabulary books, etc. provide students with additional assistance. The books and materials cannot be religiously affiliated.

6. **Religiously Affiliated Institutions** – It is allowable for Title I personnel to go on the property to provide Title I educational services.
7. **Evaluation** – There is no separate evaluation for children in local institutions for neglected children for Title I accountability purposes.
8. **Other** – If a district is unable or unwilling to provide services to children in local institutions for neglected children, the state must reduce the district's allocation by the amount generated by the neglected children. The Kentucky Department of Education (KDE) may transfer the funds to another district that agrees to assume educational responsibility for the neglected children. The KDE may retain the funds if the KDE assumes educational responsibility for the neglected children. If the institution closes and the children are transferred to an institution in another district, the KDE must adjust the allocations of the two districts to reflect the transfer.

Local Neglected Institutions 2006-07		
Institution and LEA	**District Caseload**	**Facility Caseload**
Adair County	**4**	
Adanta/Westwood Group Home (Lori Kelsey 270-384-3898)		4
Bardstown Independent Schools	**6**	
Nelson Co. Community Based Residential (Wesley Monroe) 502-833-4070)		6
Barren County	**34**	
Kinderhaven Spectrum Care (Angela Radar-Todd 270-678-1042)		19
Spectrum Care Academy (Baerette Bishop) 270-678-4706)		15
Beechwood Independent Schools	**33**	
Catholic Children's Home (Sister Mary Ann Kathman 859-331-2040-211)		33
Boone County Schools	**23**	
Maplewood Children's Home (Kathryn Stephens) 859-261-8768)		23
Boyd County Schools	**9**	
Community Presence, Inc. (Ted Griffith 606-475-9122)		9
Calloway County Schools	**9**	
Community Youth Services (Sarah Hart 270-251-2661)		9
Campbell County Schools	**13**	
Holly Hills Children's Home (Constance Wong 859-635-0500-212)		13
Carter County Schools	**18**	
Community Presence, Inc (Ted L. Griffith 606-475-9122)		18
Clay County Schools	**0**	
Calvary Baptist Childrens' Home (Donna Reid 606-598-4053)		0
Covington Independent Schools	**48**	
Brighton Center (Katie Garrett 859-491-8203 (2008)		7
Brighton Homeward Bound (Brad Ervin 859-581-1111)		5
Children's Home of Northern Kentucky (Jodi Schmidt 859-261-8768-3100)		36
Danville Independent Schools	**20**	
Woodlawn Children's Campus (Lee Martin 859-236-5007)		20

Local Neglected Institutions 2006-07		
Institution and LEA	**District Caseload**	**Facility Caseload**
Fayette County Schools	**13**	
Coleman House (Anita Cummings 859-254-0361)		0
Metro Group Home (Janet Vessels) 859-259-3212)		2
Florence Crittenden Home (Mary Venezie 859-252-8636)		11
Buckhorn Childrens & Families (Rebecca Parrott 859-277-3238)		0
Graves County Schools	**12**	
New Pathways for Children (Tracey Wyatt 270-674-6061)		12
Hardin County Schools	**14**	
Glen Dale Childrens Home (Barbara Ellerbrook 270-369-7380)		14
Jefferson County Schools	**403**	
Bellewood Presbyterian Home for Children (Teresa Landenwich 502-245-4171)		38
Brooklawn, Inc (Frances McCormick 502-515-0460)		98
St. Joseph Catholic Children's Home (Barbara Donaghue) 502-429-7217)		30
Father Maloney's Boys' Haven (Vern Rickert 502-458-1171)		39
Maryhurst School (Judy Lambert) 502-245-1576)		149
Home of the Innocents (Larry Owens 502-596-1209)		49
LaRue County Schools	**51**	
The Life Connection (Bruce Arnette 270-3324-4956)		51
Madison County Schools	**7**	
Buckhorn Childrens & Families (Nathan Fisher 859-623-9717)		7
McCracken County Schools	**15**	
New Pathways (Tracey Wyatt 270-674-6061)		15
Murray Independent Schools	**9**	
Community Youth Services (Sarah Hart 270-251-2661)		9
Oldham County Schools	**13**	
Home of the Innocents Host House (Elizabeth Heudecker 502-225-9944)		13
Perry County Schools	**28**	
Buckhorn Children's Center (Richard Word 606-398-7000)		28
Pulaski County Schools	**7**	
Mt. View Group Home (Colleen Bivens 606-679-6251)		3
Shoreline Group Home (Sandra Coner 606-678-8551)		4
Russell County Schools	**5**	
Jamestown Group Home (Sandra Coner 606-679-4782-226)		5

The chart shows the name of the district, the name of the local institutions for neglected children and the contact name (with phone number). It also shows the number of children listed on the October count. The children are a part of the formula children used to calculate the Title I, Part A allocation. The amount of funds generated by children in local neglected institutions becomes a part of the Title I, Part A allocation. Funds must be set aside at the district level to provide comparable services to children in the local neglected institution. It is not necessary to set aside the total amount generated. All children in the local neglected institution may benefit from the funds set aside for services.

PRESCHOOL AND TITLE I

NCLB, Title I, Part A, Sections 1112 and 1115

PRESCHOOL AND TITLE I

NCLB, Title I, Part A, Sections 1112 and 1115

Preschool can play a major role in providing high-quality early learning experiences to young children. Supporting children's growth, development, and learning in the early years, particularly for children who face significant challenges to successful learning, is an important strategy for preventing school failure. Research has found that intensive, high-quality preschool programs can close much of the early achievement gap for lower-income children (Barnett, 1998). Title I recognizes the value of early intervention through proven approaches. This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Serving Preschool Children Under Title I* that may be found at **http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln**

Funding Preschool Programs

A district may reserve funds (set-aside) to operate Title I preschool programs. Those funds may be distributed to other comparable public early childhood education programs (such as Head Start, Even Start, Early Reading First) to operate Title I preschool programs. Public schools receiving Title I funds may use the school's allocation to operate a Title I preschool program.

A district or school is **not** required to serve preschool students. Preschool students cannot be included in calculating the allocations to schools. The district may reserve funds in the district set-asides to serve eligible preschool students in the district as a whole or for a portion of the district; or a participating school may use its Title I funds to serve eligible preschool students. The requirements for a targeted assistance school and a schoolwide program apply to services for preschool students.

Kentucky's preschool education programs are available for all four-year-old children who are eligible for free lunch; all three and four-year-old children with developmental delays and disabilities, regardless of income; and other four-year-old children as placements are available. Title I preschool programs cannot replace those services. Title I preschool programs must supplement the Kentucky preschool programs.

Standards for Preschool Programs

A district that uses Title I funds to provide preschool programs to low-income children must ensure that those services comply at a minimum with the achievement standards established under section 641A(a) of the Head Start Act. The specific Head Start standards applicable to Title I preschool programs are in regulations at 45 CFR 1304.21-Education and Early Childhood at: http://www.headstartinfo.org/pdf/1304.pdf.

A Title I preschool program using an Even Start model must integrate early childhood education, adult literacy or adult basic education, and parenting education into a unified family literacy program. Also, the Title I preschool programs using an Even Start model must include program elements (1) through (15) in section 1235 of Title I, Part B. The legislation for the Even Start Family Literacy Program is at: http://www.ed.gov/programs/evenstartformula/index.html.

The *Kentucky Early Childhood Standards* document was designed to reflect the range of developmental abilities typical of young children, birth through four years of age. Although the Kentucky Department of Education does not require public preschools to design their programs around these standards, districts will want to reference the information as preschool programs are being developed. The *Kentucky Early Childhood Standards* are at: http://www.education.ky.gov/KDE/Instructional+Resources/Preschool/default.htm.

Eligible Students

When a Title I preschool is funded at the district level criteria must be established to identify the children who are most at risk of failing to meet Kentucky's student academic achievement standards. The district must include multiple, educationally related, objective criteria.

A preschool that is part of a Title I school operating a **schoolwide** program is not required to identify particular children as eligible to participate in the Title I preschool. Rather, all children in the attendance area of the school are eligible for preschool services.

To be eligible to attend a Title I preschool program in a **targeted assistance** school, preschool-age children must be failing or most at risk of failing to meet Kentucky's student academic achievement standards as determined by multiple, educationally related, objective criteria established by the district and supplemented by the school.

Children who participated in a Head Start, Even Start, Early Reading First, or Title I preschool program at any time during the two preceding years, homeless children, and children in institutions for neglected or delinquent children are automatically eligible for Title I preschool and to continue into Title I school programs.

Qualifications for Teachers and Paraeducators

Beginning in Fall 2004, **only** certified or exempted teachers may be hired as lead teachers in state-funded and Title I funded preschool programs. Districts must hire teachers with the IECE certificate (or IECE Probationary), an IECE statement of eligibility, or a letter of exemption. Districts must pay all certified teachers on the certified scale. Classified preschool teachers who were lead teachers prior to Fall 2004 may stay in their positions as classified teachers, but they may not be hired by another district. Information on teacher certification is available from the Kentucky Education Professional Standards Board at: http://www.kyepsb.net/.

Preschool paraeducators whose duties include instructional support and who work in a program supported with Title I, Part A funds must meet **one** of the following NCLB requirements –

- Completed two years of study at an institution of higher education; **or**
- Obtained an associates (or higher) degree; **or**
- Met a rigorous standard of quality and be able to demonstrate, through a formal State or local academic assessment, knowledge of and the ability to assist in instructing reading, writing, and mathematics (or as appropriate reading readiness, writing readiness, and mathematics readiness).

Parental Involvement

Parent involvement in the education of children should begin as soon as they start school. Early childhood, preschool, and kindergarten programs that train parents to work with their children at home tend to have significant, positive effects. All provisions of parent involvement that are required for schoolwide and targeted assistance programs are also requirements of a Title I funded preschool except the discussion of school-parent compacts at parent-teacher conferences in elementary schools.

PARENT INVOLVEMENT

NCLB, Title I, Part A, Section 1118

PARENT INVOLVEMENT

NCLB, Title I, Part A, Section 1118

Research shows when schools work together with families to support learning, children are inclined to succeed not just in school but also throughout life. Participation of parents and families is critical throughout a child's entire academic career. This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Parent Involvement* that may be found at <**http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.**

Funding Parent Involvement Activities

Any district with an allocation of more than $500,000 must set aside 1% of their allocation to carry out the required parent involvement activities. At least 95% of the funds set aside for parent involvement activities must be distributed to the schools. Districts with an allocation of $500,000 or less are still required to implement the parent involvement requirements. Parents must be involved in the decisions as to how the parent involvement funds are allocated for parent involvement activities.

Districts providing Title I services to private schools must reserve funds for parent involvement activities for parents of participating private school children. The district must reserve parent involvement funds before allocating funds to Title I public schools. The funds must be proportionate to the number of eligible private school children. For example, if the percent of eligible private school children is 5% of the total low-income students in the district, the percent of parent involvement funds to be reserved from the districts parent involvement funds for the private school is 5%.

Building Capacity for Involvement

In order to ensure effective parent involvement for building capacity the district must:

- Assist parents in understanding Kentucky's assessment and their child's performance.
- Provide training and materials to help parents work with their children to improve their achievement (i.e. literacy and technology training).
- Train staff with the assistance of parents on how to reach out to, communicate and work with parents as equal partners in their children's education.
- Implement and coordinate parent programs.
- Inform parents about school activities and meetings in a language they can understand.
- Coordinate and integrate parent involvement programs with Head Start, Reading First, Early Reading First, Even Start, the Home Instruction Program for Preschool Youngsters, the Parent as Teachers Program, and public preschool to support parents in helping in their children's education.

The district may:

- Involve parents in the development of training for staff to improve the effectiveness of the training.
- Provide transportation and childcare to enable parents to participate in school related meetings and trainings.
- Offer meetings at a variety of times and conduct in-home conferences to encourage parent involvement.

- Adopt and implement model approaches to improve parent involvement and provide support for parent involvement as requested by parents.
- Establish a districtwide parent advisory council and involve community organizations and businesses in parent involvement activities.
- Train parents to help promote the involvement of other parents.
- Provide literacy training, if no other funds are available for training.

Resources to Improve Parent Involvement

Contact ED's Information Resource Center for information on ED programs, resources, and events at 1-800-USA-LEARN. Specific activities and resources include:

- **Education News Parents Can Use**, a television series about ways to ensure children's educational success. The third Tuesday of each month during the school year, **Education News** provides parents with the tools and information they need to be effectively involved in their children's learning. [For information on how to register visit the following URL and go to FAQs: http://www.ed.gov/news/av/video/edtv/index.html.]
- **EDPubs**, the Department's Publication Center has a multitude of free materials and resources that can assist SEAs, LEAs, schools, parents, communities, and organizations in encouraging and maximizing parental involvement. [EDPubs can be reached directly by calling 1-877-4ED-PUBS (433-7827). Order documents by email at edpubs@inet.ed.gov.]
- **The Achiever**, a biweekly electronic newsletter that provides information, events and announcements about *No Child Left Behind.* For other newsletters and journals from ED visit: http://www.ed.gov/news/newsletters/index.html
- The **No Child Left Behind website** at: http://www.nochildleftbehind.gov/
- The "**What Works Clearinghouse**" (WWC), a project to help education decision-makers answer such questions as *how do we create better schools and how can we make sure that all children can read*? A part of the Department's Institute of Education Sciences, the WWC has been established to put solid evidence from high-quality scientific research into the hands of educators, policy-makers and the public so they may make better choices about programs and practices. To receive e-mail updates, subscribe to *WWCUpdate* on the Web at www.w-w-c.org, or call 1-866-WWC-9799.
- **National Center for Family and Community Connections with Schools**, funded through the Southwest Regional Educational Laboratory (SEDL) by the Department's Institute of Education Sciences, bridges research and practice to remove barriers to student achievement. The Center links people with research-based information and resources that they can use to effectively connect schools, families, and communities. The Center reviews emerging findings and research to develop an online database, annual conferences and annual reports to help advance procedural knowledge and provides training and networking across the regional educational laboratory system to link research findings to practice. [For more information visit http://www.sedl.org/connections/about.html.]

District Level Requirements

Annual Evaluation

An annual evaluation of the effectiveness of the district's Parent Involvement Policy and parent involvement activities must be conducted. The evaluation should determine whether:

- The academic quality of the school has improved.
- Parent participation has increased.
- Barriers exist that hinder greater participation by parents.

The evaluation may be conducted through a written survey, a telephone survey or in person. Districts must document and summarize the evaluation findings and how the information will be used to improve the parent involvement program.

District Parent Involvement Policy

A written parent involvement policy at the district level must be jointly developed, agreed upon, and distributed to parents of participating children. The district's current Parent Involvement Policy should be revised to determine that it meets the Title I parent Involvement policy requirements. The district policy must be reviewed by parents and revised as needed on an annual basis. Documentation of the review must be on file in the Title I coordinator's office.

A written district parent involvement policy must establish expectations for parent involvement and describe how the district will:

1. Involve parents in the joint development of the Comprehensive District Improvement Plan and in the process of school review and improvement.
2. Provide the coordination, technical assistance and other support necessary to assist participating Title I schools in planning and implementing effective parent involvement to improve student academic achievement and school performance.
3. Build the schools' and parents' capacity for more effective parent involvement.
4. Coordinate and integrate parent involvement strategies with Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters.
5. Conduct an annual evaluation of the content and effectiveness of the Parent Involvement Policy in improving the academic quality of the schools including identifying barriers to greater participation of parents, in particular: low-socioeconomic, limited English proficiency, limited literacy, or minority parents.
6. Use the evaluation findings to improve the parent involvement program and revise the Parent Involvement Policy as needed.

School Level Requirements

Annual Evaluation

An annual evaluation of the effectiveness of the school's Parent Involvement Policy and parent involvement activities must be conducted. The evaluation should determine whether:

- The academic quality of the school has improved.
- Parent participation has increased.
- Barriers exist that hinder greater participation by parents.

The evaluation should indicate whether the school is a targeted assistance school or a schoolwide program. The evaluation may be conducted through a written survey, a telephone survey or in person. Districts must document and summarize the evaluation findings and how the information will be used to improve the parent involvement program.

School Parent Involvement Policy

Each Title I school must jointly develop, agree upon and distribute to parents of participating Title I children a written parental involvement policy. This policy must:

- Be reviewed by the school to determine that it meets parent involvement requirements.
- Be reviewed by parents and revised as needed on an annual basis with documentation of the review on file in the Title I coordinator's office and in the school.

A school's written policy must describe specifically how the school will:

1. Hold an annual meeting to inform parents of their school's participation in Title I, to explain Title I requirements and the parent's right to be involved.
2. Offer a flexible number of meetings (transportation, child care, or home visits may be provided if needed) to encourage parent involvement.
3. Involve parents in the planning, review and improvement of the parent involvement programs.
4. Provide parents of participating Title I children:
   - Timely information about Title I programs.
   - School performance reports; including school curriculum, core content and student performance standards.
   - Student's assessment results.
   - Description and explanation of the curriculum used at the school and the types of academic assessment used to measure student progress.
   - Additional opportunities for parents to offer suggestions and to participate in decisions relating to the education of their children.
5. If the schoolwide program plan is not satisfactory to the parents of children in the school, submit any parent comments on the plan when the school makes the plan available to the district.

School-Parent Compacts

All Title I participating schools must develop a school-parent compact jointly with parents of Title I participating students that:

1. Describes the school's responsibility to provide high quality curriculum and enables Title I children to meet Kentucky's academic achievement standards.
2. Describes how parents will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, television watching, volunteering in their child's classroom, participating in decisions relating to their child's education and positive use of extracurricular time.
3. Addresses the importance of establishing ongoing, good communication between teachers and parents through:
   - Annual parent-teacher conferences to discuss individual student progress discussing the child's achievement.
   - Frequent progress reports to families on student academic progress.
   - Reasonable access to staff and opportunities to volunteer, observe and participate in classroom activities.

District Title I Parent Involvement Checklist

These questions may assist a district in knowing if parent involvement requirements have been met at the district level. This is not a required form and is not sent to the State Title I office. *For a district parent involvement program to be in compliance, each question must be answered "YES."*

1. Was the district Parent Involvement Policy developed jointly and agreed upon by the parents of participating Title I students through meaningful consultation?
2. Has this Parent Involvement Policy been distributed to parents?
3. Does the Parent Involvement Policy describe how the district will:
   - Establish the expectations for parent involvement?
   - Involve parents in the joint development of the Title I program?
   - Involve parents in the school review and improvement plan?
   - Provide the coordination, technical assistance and other necessary support to participating schools in their planning and implementing of effective parent involvement?
   - Build the capabilities of schools and parents to ensure strong parent involvement?
   - Coordinate and integrate Title I Parent Involvement strategies with those of Head Start, Even Start, Reading First Program, Early Reading First, Parents as Teachers Programs, Home Instruction Programs for Preschool Youngsters?
   - Annually evaluate the policy as to its effectiveness in increasing parent participation, and identifying barriers to parent participation (e.g. low-income, disabilities, literacy, English proficiency or other racial or ethnic consideration)?
   - Use the findings of the annual evaluation to design strategies for school improvement or to update the district policy?
4. Is the district policy recorded in the board meeting minutes?
5. If the district has an allocation of $500,000 or more, does the district expend at least one percent of its allocation for parent involvement purposes? Is at least 95% of that one percent distributed to the Title I schools? If the district receives less than $500,000, does the district expend funds for parent involvement?
6. Are the parents of participating Title I students involved in deciding the ways in which the parent involvement funds are used?
7. Does the Parent Involvement Policy ensure effective parent involvement and support a partnership among schools, parents and the community by:
   - Assisting parents in understanding Kentucky's assessment and their child's performance?
   - Providing training and materials to parents to help their children's achievement (i.e. literacy and technology training)?
   - Training staff in how to reach out to, communicate and work with parents as equal partners in their children's education?
   - Informing parents about school activities and meetings in a language they can understand?
   - Involving parents in the development of training for staff to improve the effectiveness of the training? Enabling parents to participate in school-related meetings, trainings and parent involvement activities by providing transportation and child care if needed?
   - Offering meetings at a variety of times and locations to encourage parent involvement?
   - Adopting and implementing model approaches to improve parent involvement and provide support for involvement as requested by parents?
   - Establishing a districtwide parent advisory council and involve community organizations and businesses in parent involvement activities?
8. Does the district provide full opportunity for the participation of parents with limited English proficiency or with disabilities?
9. Does the district have documentation to substantiate the above? Such documentation could include agendas from parent meetings or trainings and comments from parents. Does the district have on file a copy of each school's Parent Involvement Policy?

School Title I Parent Involvement Checklist

These questions may assist a district and school in knowing if parent involvement requirements have been met at the school level. *For a school parent involvement program to be in compliance, each question must be answered with a "YES."*

1. Was the school Parent Involvement Policy developed jointly and agreed upon by the parents of participating Title I students through meaningful consultation?
2. Has the Parent Involvement Policy been distributed to parents?
3. Does the Parent Involvement Policy describe implementation of:
   - An annual meeting held at a convenient time to inform parents of school's participating in Title I and what this means for them?
   - A flexible number of meetings where transportation, childcare or home visits are provided as needed?
   - The involvement of parents in an organized, ongoing and timely way to assist in planning, reviewing and improving, the Parent Involvement Policy and the school parent involvement program?
   - Findings from the annual evaluation and their utilization in revising the Parent Involvement Policy?
4. Does the Parent Involvement Policy provide timely information concerning
   - The Title I program?
   - School performance profiles that show the school's progress toward meeting the learning goals/academic expectations?
   - The individual student assessment results and interpretation of those results?
   - A description of the school curriculum?
   - An opportunity for parent input to allow for suggestions and participation in decisions relating to the education of their children?
5. Was the School-Parent Compact developed with the parents of the participating Title I children?
6. Does the compact describe how parents, the entire school staff and students will share the responsibility for improving student achievement?
7. Does the compact describe how the school and parents will build and develop a partnership to achieve Kentucky's high standards?
8. Does the compact provide:
   - A description of the school's responsibility to provide a high-quality curriculum and instruction in a supportive and effective learning environment that enables students to meet Kentucky's performance standards?
   - A description of the ways in which parents will be responsible for supporting their children's learning, such as monitoring attendance; homework completion and television watching; volunteering in the classroom and participating in decisions related to their child's education?
   - A description of the importance of ongoing communication between parents and teachers by at least one annual parent-teacher conference where the compact is discussed as it relates to the child's achievements; frequent reports on the child's progress and reasonable access by the parent to the school staff?
9. Does the Parent Involvement Policy ensure effective parent involvement and support partnerships among schools and the community by:
   - Providing materials and training to parents?
   - Using the assistance of parents to educate teachers, pupil service personnel, principals and other staff in the value and utility of contributions from parents and how to reach out and work with parents as equal partners in implementing and coordinating parent involvement and building ties between home and school?
   - Coordinating and integrating Title I parent involvement strategies with those of Head Start, Even Start, Early Reading First, Reading First, Parents as Teachers Program, and Home Instruction

Program for Preschool Youngsters and public preschools?

- Providing activities and opportunities such as parent resource centers, training in child development and other areas to help the parents become a full partner in their child's education?
- Ensuring that information related to school and parent programs, meetings and other activities are sent to the parents in the language used at home?

10. Does the school provide full opportunity for the participation of parents with limited English proficiency or with disabilities?
11. Does the school have documentation to substantiate the above answers? Such documentation could include agendas from parent meetings or trainings and comments from parents?

Sample
Annual Parent Involvement Evaluation

Please customize the evaluation with district letterhead. Personalize the evaluation to contain names of teachers, instructional assistants, classes, etc. and to reflect the program at your school. This evaluation is only a sample and should be revised to address a schoolwide program or a targeted assistance school. This sample has combined issues for both programs.

Dear Parents:
Your child has been a participant in the schoolwide program or targeted assistance school with a focus on (reading/math/social studies/science) during this school year. (Personalize with child's name, type of program and focus area of TAS to fit your school.)

The purpose of this questionnaire is to gather information on how well the school communicates with parents of children who receive Title I services (change this if the school is a SWP). Please take a few minutes to complete this questionnaire. Your feedback will be used to improve parent involvement activities. Suggestions on how we can better help our students at home or at school are welcome.

Please answer Yes or No and return to (name of school or teacher) with your child. Thanks for your valuable input.

1. (For TAS) Were you notified when your child was chosen for Title I services? (For SWP) Were you notified that your school is a schoolwide program?
2. Did you receive a copy of the school Parent Involvement Policy?
3. Did you talk about the School-Parent Compact with the teacher
4. Were you invited to a meeting to talk about the SWP or TAS program (including discussions about curriculum, assessment and expected performance levels)?
5. Have you been invited to a parent-teacher conference this year?
6. Were you offered information or suggestions as to how to help and support your child's learning (e.g. monitoring attendance, TV, homework completion, etc.)?
7. Have you been asked how the school could improve the parent involvement program?
8. Were you asked to help design the school's Parent Involvement Policy?
9. Did you receive student progress reports in a timely manner?
10. Is the information provided to you understandable?
11. Has the school staff been supportive and willing to help?
12. Has the instructional program been a positive experience for your child?
13. Has the school provided a variety of learning opportunities for your child?

Please check the items that apply.

14. Which would be the best source(s) for you to receive information about your school?

Newspaper	School newsletter	Your child	Title I teacher
Principal	Classroom teacher	Other parents	Other (Explain)

15. What help could you use that would allow you to attend parent-teacher conferences, parent meetings, and training sessions?

Child care	Transportation	Time of meeting	Disability accessibility
Someone to read materials		Interpreter (List language)	

Sample
Annual Parent Involvement Evaluation

Here is another sample of an evaluation. Remember to personalize the survey. Add an introduction explaining the purpose of the survey. Ask questions so that you receive information that will assist you in improving parent involvement.

Please answer Yes or No to the following:

1. I have been invited to attend training to help my child succeed in school.
2. I am aware of when the school council holds its meetings.
3. I received a copy of the school-parent compact.
4. I was invited to attend the meeting to work on/revise the school-parent compact.
5. I am aware of Kentucky's standards and goals for the school and how the staff is working on achieving these goals.
6. I have the opportunity to give input into the school policies.
7. I was notified of the meeting to evaluate the school's Parent Involvement Policy.
8. My child has benefited from the help of Mr./MS._____.
9. My child felt comfortable about attending this school.
10. Meetings were held at a convenient time of the day.
11. Working in the science lab has helped improve my child's understanding of science.
12. Materials sent home were easy to follow and easy to understand.
13. I was kept well informed of the activities at the school.
14. I felt comfortable and welcome in the school.
15. I felt comfortable volunteering at the school.
16. I received clear information regarding my child's academic progress.
17. Opportunity has been provided for parents to communicate with principals and other administrative staff.

If you answered "No" to any of these, please offer suggestions to help us in that area. Please offer any comments that you feel will strengthen the parent involvement program at the school. Thanks for your time and participation.

Family Engagement Resources

The following are resources on family engagement:

1. SEDL's On-line Module for Family and Community Involvement http://www.sedl.org/learning/
2. Information, activities and advice for parents and educators of English Language Learners www.colorincolorado.org
3. Epstein, J., Sanders, M., Simon, B., Salinas, K., Jansorn, N. Voorhis, F. (2002) School, Family, and Community Partnerships: Your Handbook for Action Second Edition. Corwin Press, Inc.
4. Kyle, D., McIntyre, E., Miller, K., Moore, G. (2002). Reaching Out: A K-8 Resource for Connecting Families and Schools. Corwin Press, Inc.
5. National Center for Family Literacy www.famlit.org www.famlit.org/Resources/index.cfm
6. Appalachian Regional Comprehensive Center http://www.arcc.edvantia.org/
7. Ed Trust Parent and Community Involvement http://www2.edtrust.org/EdTrust/Parents+and+Community/
8. Prichard Committee Parent Involvement Toolkit www.prichardcommittee.org

On the next pages you will find two activities from the Prichard Committee Parent Involvement Toolkit:

1. **Linking a School-Family Compact to Learning** – This is a process that may used with schools so that compacts are directly linked to learning.
2. **Is Your School Family-Friendly?** – This is a checklist to assist schools in determining if they are family friendly.

Tip Sheet: Linking a School-Family Compact to Learning

What's a Compact? In a compact, families and school staff agree how to work together. Every Title I school must develop a school-family compact, according to the No Child Left Behind law (Section 1118). Teachers and parents like compacts because they make it clear who should do what to encourage students. Students like being treated as a responsible person. The compact should describe:

- What parents, school staff, and students will do to improve student progress
- How the school and families will build a partnership to help children learn
- How the school and families will communicate regularly with each other.

How is a Compact Linked to Learning? Here are some suggestions:

1. Check your school's test data. Look for areas where students' scores are low, and for gaps between different groups of students.
2. Set two or three goals for improvement. If reading scores are low, adopt a goal of moving all students out of the bottom quartile ("below basic"), and moving more students into proficient.
3. Ask parents, students, and school staff what THEY should do to meet the goals. Then ask each group to list what it wants the OTHERS to do.
4. Focus on issues raised in the discussions, such as homework, communications, and rules of behavior. For each one, list what parents, teachers and students can do.
5. Draw up a first draft, then ask for comments. Revise it based on how parents, teachers and students react.

Revising Compacts: Compare the old-style compact at the left with a compact that focuses on improving students' reading and math skills.

Old Style Compact: "This compact will promote effective working relationships to improve student achievement."	**Compact Linked to Learning:** "This compact pledges our school community to increase student reading and math skills so that all students will be proficient by the end of third grade."
Parents Pledge: I will • Send my child to school every day • Keep in contact with school once a month	Parents Pledge: I will • Let the teacher know if my child has any problems with learning. • Use reading and math materials the school sends home each week to help

• Support the school dress and discipline codes • Be an active participant in my child's learning process • Limit TV watching time	my child. • Read to my child 20 minutes a day. • Keep a list of new words, and link letters to sounds. • Play numbers games with my child every week • Help my child see how to use reading and math to pursue his/her interests and goals.
Students Pledge: I will • Complete my classwork • Come to school prepared to learn • Respect adults, myself and other students • Obey school rules • Complete my homework	Students Pledge: I will • Let my teacher and family know if I need help • Read on my own and with my family every day • Work on my math and reading skills at home, using the materials my teacher sends home • Write down assignments, do my homework every day, and turn it in when it's due • Write a report each week about a TV program I watch
Teachers Pledge: We will • Have high expectations for all students • Develop a classroom climate that is comfortable for all students • Develop proficient learners • Enforce rules fairly and consistently • Provide the books and necessary supplies for education	Teachers Pledge: We will • Create a partnership with every family in my class • Monitor student progress in reading and math and update parents monthly • Make sure all students get help as soon as it's needed • Send home learning materials in math and reading • Explain my approach to teaching, expectations, and grading system to students and their families • Continually work on my teaching strategies so that I can successfully teach ***all*** children. • Assign work that is relevant and interesting • Make sure students understand the assignment and what they'll learn from it, and grade it promptly.

Hazards Ahead Here are some things to watch out for:

- ☐ Keep the pledges about equal in length for each group. Don't list 15 obligations for parents and only five for teachers.
- ☐ Make the lists short -- no more than ten items for each group.
- ☐ Don't patronize parents. A typical pitfall: "I will make sure my child is clean and rested." (Parents might react, "Why would they even think I wouldn't do that?")
- ☐ Offer clear guidelines. Rather than "limit TV time," try, "limit TV to one program a day." Then teachers could ask students to interview their parents about the program.

Other Pointers

☐ Include information that will help parents and students know how to do what's expected. Or follow up with some tip sheets. Instead of: "I will talk to my child about school daily," try: "When I talk to my child each day about school, I'll ask questions that can't be answered just with yes or no. Through the week, I'll try to cover what they're learning, what they like about school, and any problems they're having."

☐☐Use the compact at parent-teacher conferences and other meetings. Discuss how each side is doing in sticking to the pledges. Ask if other measures are needed.
☐ Revisit the compact every year. Review its effectiveness with families, students, teachers and other school staff. Ask each group how they think it could be better. Update it using the most recent data.

Copyright: Anne T. Henderson, Institute for Education and Social Policy, 2004. For more information, see *NCLB: What's in it for Parents*, published by Prichard Committee for Academic Excellence in Lexington, KY. To order or download, go to www.prichardcommittee.org

CENTER FOR Parent Leadership

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IS YOUR SCHOOL FAMILY-FRIENDLY?

BACKGROUND

Studies of effective schools find that the climate of the school – from the way the parking lot is set up to the friendliness of school staff and how they answer the phone – sets the stage for higher expectations and learning for all students.

When schools welcome families, establish personal relationships between and among families and staff, help parents understand how the system works, and encourage family-staff collaboration to improve student achievement, students do better in school, and the schools get better.

Interviews with parents, business leaders, community members, and students find that welcoming, family-friendly schools share common characteristics. It doesn't take a formal school climate survey to assess whether a school is open, accessible, empowering, and focused on student achievement.

The following checklist offers a thought-provoking way for you and others to look at your school, start discussions, and determine simple actions to take. Making a school more family-friendly does not have to be complicated or require a lot of funds. And it can make a huge difference for families, students and staff.

Adapted from "*Is Your School a Welcoming School*"? developed by The Partnership for Kentucky Schools in 1998 for the Prichard Committee's Commonwealth Institute for Parent Leadership. March 2005

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Family-Friendly School Checklist

Mark each statement with a number:

Already doing this:	4	This would take some time:	2
Could do this easily:	3	This would be really hard:	1

Welcoming environment

_____ Friendly signs inside and out welcome families and visitors and explain how to get around the building. ***Extra credit***: A parent help desk is just inside the main entrance.

_____The school has standards of welcoming behavior that apply to all staff, including bus drivers, security guards, custodians and cafeteria workers.

_____Front office staff are friendly -- recognize visitors right away, provide information easily, and answer the phone in a way that makes callers glad they have called.

_____There is a comfortable family resource room stocked with books, games, and educational information that families can borrow and where parents can meet.

Total score _____ (Add one point if the extra credit applies to you)

Programs and activities to engage families in improving student achievement.

_____Current student work is displayed throughout the building. Exhibits clearly explain the purpose of the work and the high standards the work should reflect.

_____All programs and activities for families focus on student achievement – they help families understand what their children are learning and promote high standards.

_____Special workshops, learning kits, and other activities show families how to help their children at home -- and respond to what families say they want to know about.

_____The school reports to parents about student progress and how teachers, parents and community members can work together to make improvements.

Total score _____

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Strong relationships between teachers and families

_____ A "joining process" welcomes families to the school, offers tours, and introduces them to staff and other families. ***Extra credit:*** Bilingual speakers are available to help families.

_____ There are frequent opportunities for teachers and families to meet face-to-face and get to know each other – class meetings, breakfasts, home visits, class observations.

_____ Teachers or advisors make personal contact with each family at least once a month.

_____ A family liaison helps teachers connect to families and bridge barriers of language and culture.

Total score _____ (Add one point if the extra credit applies to you)

Developing families' self-confidence and power

_____ Families are involved in planning how they would like to be involved at the school.

_____ School committees and the PTA/PTO reflect the diversity of the school community and actively recruit and welcome families from all backgrounds.

_____ The school is open and accessible – it is easy for parents to meet with the principal, talk to teachers and counselors, and bring up issues and concerns.

_____ Parents develop school improvement projects and do action research – survey other families, observe in classrooms, review materials, and visit other schools and programs.

Total score _____

Professional development for families and staff

_____ Families learn how the school system works and how to be an effective advocate for their child. ***Extra credit:*** Each student has a student support team that includes their parent(s).

_____ Teachers learn about effective approaches to working with families of diverse cultural backgrounds.

_____ Families and staff have opportunities to learn together how to collaborate to improve student achievement.

_____ The school reaches out to identify and draw in local community resources that can assist staff and families.

Total score _____ (Add one point if the extra credit applies to you)

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Total Score for entire checklist: _____

A 70-80 You're a Family-Friendly School!
B 60-69 With a little more work, you'll be there.
C 50-59 Focus on the easiest areas, then tackle the harder ones.
D 40-49 You may need outside help. Pull together an action team.

Which areas are you doing well in?	**Which ones will need more work?**
What can the school do to become more family-friendly?	**How could parents help the school be more friendly?**
What are your concerns?	**What could YOU do to help your school become more family-friendly?**

Some ideas about next steps:

1. Focus first on statements marked #3 that can be easily improved. Or identify an area (e.g. relationships or welcoming) whose total score was above 12 and work on that area. This will start to change your school culture. But don't stop here!
2. Next, identify the areas that need more work and develop strategies to improve them.
3. Then tackle the lowest scoring areas. You will find that the changes already made will make the trouble spots easier to address.

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PARTICIPATION BY PRIVATE SCHOOL CHILDREN AND TEACHERS

NCLB, Title I, Part A, Sections 1120 and 9501

PARTICIPATION BY PRIVATE SCHOOL CHILDREN AND TEACHERS

NCLB, Title I, Part A, Sections 1120 and 9501

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Title I Services to Eligible Private School Children* that may be found at <**http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.**

Overview

The *No Child Left Behind Act* (NCLB) requires a district to annually offer equitable participation in Title I, Part A services to each private school that has children from participating Title I, Part A attendance areas. The district must offer this participation through timely and meaningful consultation with each private school. The private school may be located within or outside the district. Home schools are treated as private schools for Title I, Part A purposes. Title I, Part A provides services to eligible private school children, **not** funds to private schools.

In NCLB, equitable participation is measured by the amount of funds spent on children, teachers and families. This means that a low-income private school child living in a participating Title I, Part A attendance area must generate the same per pupil allocation as the low-income public school child living in the same participating Title I, Part A attendance area. To be eligible to receive Title I, Part A services, a child must reside within the attendance area of a participating public school location in a low-income area and be failing or at risk of failing student academic achievement standards. Certain other children may be identified as eligible solely by their status: for example, homeless children and children who in the preceding two years had participated in Head Start, Even Start, Early Reading First, or a Migrant Education program. The allocation for each low-income child in the private school is combined. From these combined funds, the service to all of the Title I eligible children is provided. Children with the greatest need must be served first. A similar allocation process is used to determine the equitability of professional development and parent involvement services for the teachers and families of participating private school children.

Definition of Equitable Services

If the following occur, services by the district to private school children are deemed equitable.

- The district assesses the specific needs of the eligible private school children and rank orders the students so that the child with the greatest need is served first;
- The district meets the equal expenditure requirements;
- The district provides the private school children with the opportunity to participate that is equitable to the opportunity provided to public school children; and,
- The services are designed to meet the educational needs of the private school children and supplements the educational services provided by the private school and provides reasonable promise for the private school children to achieve at high levels as called for in the state's child academic standards;
- The district annually assesses the progress of the Title I, Part A program toward enabling private school children to meet the standards agreed upon through consultation with the private school.

If the following occur, services by the district to teachers and families of private school children are deemed equitable.

- The district ensures that, from the district set aside funds for parent involvement and professional development, the teachers and families of participating private school children have equal access to participate;
- The district ensures the amount of funds available to the private school teachers and families is proportionate based on the number of low-income children residing in the participating Title I, Part A attendance areas; and
- The district, after consultation with the officials of the private school, conducts professional development and parent involvement activities for the teachers and families of the participating private school children either in conjunction with public school activities or independently.

Step By Step Process for Providing Services To Private School Children

The following are detailed steps that take the Title I, Part A district staff through the process of a timely and meaningful consultation with private school officials and the provision of equitable services to eligible private school children.

1. The district Title I, Part A coordinator should determine a method for obtaining written documentation of the district's offer of equitable services to private school children and the private school's response to this offer. Title I, Part A services should be explained at the time of notification. (See the Sample Letter of Notification to Private Schools.) The documentation of the attempt(s) to notify the private school and of their reply should be kept in the district office files. Records will be reviewed at the time of a Title I, Part A program review. Here are examples of how a district may notify private schools:
   - If the district chooses to mail certified (or confirmation of receipt) letters to private schools with the "declaration of participation" for Titles II, IV and V, the letter needs to explain the difference between Title I, Part A and the other programs. When a child from the district's attendance area attends a private school in another district, Titles II, IV and V funds do not follow that child. Title I, Part A services must be offered to each private school that has children from participating attendance areas, regardless of whether the private school is located within or outside the district. The letter should also explain that Title I, Part A provides services to identified private school children, not funds to the private school.
   - It is not necessary to send notification about Title I, Part A services to private schools by registered mail. Instead, a district may send personally addressed, dated, first class letters to each private school. If the school does not reply to the letter in a reasonable length of time, note the lack of response on the letter and initial it. Remember that each private school with children from participating attendance areas must be notified, regardless of whether the private school is located within or outside the district. Home schools are considered private schools for Title I, Part A purposes.
   - Parents may read and sign-off on information regarding all services available when the parent notifies the district of the intent to home school.
   - The district Title I, Part A staff may meet individually with private school officials and have them sign and date a form stating that the private school was notified.
2. Upon receiving a response from a private school indicating interest in participating in the Title I, Part A program, the process of timely and meaningful consultation regarding the design and development of equitable services begins. To meet the consultation requirements of NCLB, there must be ongoing discussions, meetings and the exchange of information between the district staff and the private school representatives these conversations must address the following areas:

- Design and development of the district's program in areas that may affect the opportunity of the private school children to participate in the programs and during the design, development and implementation of the services to the private school children;
- How the needs of the eligible private school children will be identified;
- Services to be offered to eligible children;
- Mechanisms for the delivery of the services that would include the how, when, where and by whom the services would be delivered; (Particular attention must be paid to the use of third party providers. If the district and the private school officials are in disagreement as to the use of a third party provider, the district must provide to the private school officials a written explanation as to why it will not use the third party provider.)
- Methods by which the Title I, Part A academic services will be assessed and how the district will use the results of the assessment to improve these services;
- Size and scope of the equitable services to be provided to the eligible private school children;
- Methods or sources of data the district will use to determine the number of eligible low-income families and whether the district will extrapolate data if a survey is used;
- Equitable services the district will provide to the teachers and families of participating Title I, Part A children from the district set asides in parent involvement and professional development.

The district must maintain in its records and provide to the state a written affirmation, signed by the appropriate private school staff that the required consultation occurred. (If the private school does not submit a signed document in a reasonable time, the district must submit to the state documentation that the consultation did occur.)

3. A district must allocate Title I, Part A funds to a participating public school attendance area basis on the number of children from low-income families. To provide equitable services to eligible private school children, the district reserves the amounts generated by low-income private school children who reside in participating attendance areas. These amounts generated must be based on the same per pupil amount. A district may use poverty from the same source for both public and private school children (such as free and reduced-price meal data). If that data is not available, a district may use different poverty data for private school children as long as the income level for both sources is generally the same. Other sources of poverty data such as a survey of parents, Temporary Assistance of Needy Families (TANF/AFDC) or tuition scholarship may be used. The district, in consultation with private school officials, must obtain the best available poverty data on private school children who reside in participating attendance areas. The public school district must keep documentation of poverty data on file.

4. In consultation with private school officials, a district must establish criteria to determine the areas of greatest academic need of eligible children and then establish the criteria for identifying the children with greatest need. The needs assessment of the private school is essential in the identification of the Title I, Part A area(s) of focus.

   The following must happen for a private school to identify Title I, Part A areas of service.

   - The school must conduct a needs assessment to determine the Title I, Part A focus area(s). Analyze normed-reference test scores, student work and other academic data to determine the focus area(s) of Title I, Part A services.

- The school must identify and rank eligible children once the focus area(s) of Title I, Part A service(s) has been determined. (See Samples 1 and 2 of Ranking of Students For Services in a Private School.) The eligibility of these children is based upon the following:
  - Only children residing in participating Title I, Part A public school attendance areas may receive Title I, Part A services;
  - Children who are failing or most at risk of failing to meet state academic standards and having greatest academic need for special assistance are to be served by Title I, Part A;
  - This identification is to be based on multiple, educationally related, objective criteria established by the public school district;
  - An eligible child must not be older than 21;
  - Economically disadvantaged, disabled, migrant and limited English proficient children are eligible on the same basis as other children;
  - A child who at any time within the two years preceding the identification year participated in Head Start, Even Start, or Early Reading First is eligible; and
  - A child who is homeless is eligible.
- A sample child eligibility list included in this document. Put all of the names of children in the categories under "Eligible Children" on the list.
- Rate only the eligible children in the focus area identified by the needs assessment. Sample ranking sheets are attached for reading and math. Different skills may be substituted for those in the sample. Also, if social studies or science is determined to be the focus area, a ranking sheet may be developed for the particular content area or combined with reading.
- Developmental checklists or other screening instruments may be substituted for the ranking sheets in order to more effectively assess the needs of Kindergarten-Grade 3 children.
- The children who are in greatest academic need of assistance are provided Title I, Part A services.
- The public school district Title I coordinator should keep this data on file.

5. Through the consultation process, the district must design a supplemental program to meet the needs of the identified children with the amount of funds generated by the private school. These services must be equitable in comparison to services and other benefits provided to public school participants and must employ methods and instructional strategies for improving academic achievement that have been shown to be effective through scientifically based research. Title I, Part A personnel are not prohibited from providing instructional services in religiously affiliated schools. Personnel can go on private school property but cannot provide "in-class" services. Title I, Part A paid staff must be employees of the district or under a contract for service as a third party provider. All teachers and paraeducators who are employees of the district must meet the definition of highly qualified. Paraeducators must work under the direct supervision of the public school employed teacher. This does not permit a Title I, Part A funded program to be operated entirely by paraeducators. Paraeducators hired by a third-party contractor to work in a Title I program must work under the direct supervision of a teacher. That teacher does not have to meet the teacher qualification requirement if the third party contractor also employees the teacher. The title and control of property, equipment and supplies, must remain with the district. Delivery options in providing services to participating private school children include, but are not limited to:
   - Instruction and services provided at the private school site (free of religious symbols), in a pull-out setting by either public school employees or third party providers;
   - Educational radio and television;

- Computer-assisted instruction (in a pull-out setting);
- Extended-day services;
- Home tutoring;
- Take-home computers.

Simply providing instructional materials and supplies is **not** an option available to the district. It does not meet the equitability requirement.

If the funds allocated for private school children are not sufficient to provide instructional services, the district in consultation with the private school may provide services such as counseling staff development, and parent involvement if it is appropriate to assist the identified children to reach high academic achievement standards. The district must assess the effectiveness of these services on the academic achievement of the participating students.

6. It is important that Title I, Part A teachers and district officials consult with private school officials and instructional staff in order to coordinate Title I, Part A services. It is generally preferable to schedule this consultation during non-instructional times. The consultation may occur:
   - At a public or private school site;
   - A neutral site;
   - By telephone;
   - With the use of a simple form to be completed by the classroom teacher and the Title I, Part A teacher reporting the child's individual needs and skills being taught.
7. The district may reserve costs in the district set-asides to cover the administrative cost of operating the services to private school children. Cost for the third party contractor's administration and the cost for furniture must come out of the districts Title I, Part A administrative funds.
8. The parent involvement program funded by Title I, Part A must meet the needs of the parents of private school participants. After consultation with the private school staff and parents, the district conducts an annual meeting with the parents, initiates written compacts between the district and parents outlining their shared responsibilities and provides workshops for parents on how to work at home with their children on reading and math.
9. The equitable professional development activities provided to the private school teachers of Title I children must be designed to meet their specific needs and increase their skills and knowledge regarding providing instruction to Title I children. If reasonable and necessary, stipends may be provided during training directly to the private school teacher. Substitutes may **not** be provided.
10. The district must annually assess the progress of the Title I, Part A program toward enabling participating private school children to meet the standards agreed upon by the district and the private school. Since it is not appropriate to use the state test to assess the progress of private school children, the district must use reasonable alternative standards. Every year as part of the consultation process, the district and the private school must decide on what constitutes annual progress for the Title I, Part A program and how the program can most effectively be assessed.
11. Notification of Title I, Part A services must occur annually.

Consultation with Private School Officials

The district must have written affirmation signed by an official from each of the participating private schools that consultation occurred during the design, implementation, and assessment of the Title I activities in the private school(s) that included the following:

- How the eligible children's needs will be identified;
- What services will be offered;
- How and when the district will make a decision about the services;
- How the services will be academically assessed and how the results of that assessment will be used to improve those services;
- The size and scope of the equitable services to be provided to the eligible children and the proportion of funds that is allocated for services;
- The method or sources of data that are used to determine the number of children from low-income families in participating school attendance areas that attend private schools;
- How, when, and by whom the district will deliver equitable services to eligible children, their families and teachers, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with potential third-party providers; and
- How, if the district disagrees with the views of the private school officials on the provision of services through a contract, the district will provide in writing to the private school officials an analysis of the reasons why the district has chosen not to use a contractor.

Complaint Process for Participation of Private School Children

The following information about the complaint process for participation of private school children is taken from *Non-Regulatory Guidance: Title IX, Part A Uniform Provisions Subpart 1 Private Schools*:

By engaging in timely and meaningful consultation and developing positive relationships with private school officials, a district can minimize complaints and problems or, at a minimum, facilitate a cooperative environment for addressing them. If private school officials believe that timely and meaningful consultation has not occurred, they should first discuss this matter with the district official responsible for coordinating the consultation between the two entities. Private school officials may also contact the district superintendent or program director of the federally funded program to ask for assistance. If the response at the local level is not satisfactory, the private school official may contact the Kentucky Department of Education. Often, these steps will resolve the matter. In the event the problem is not resolved, private school officials have the right to file a formal written complaint with the Kentucky Department of Education.

A formal written complaint must include:

- A statement that the state, district, or other entity receiving Federal financial assistance has violated a requirement of a Federal statute or regulation that applies to a program requiring equitable participation;
- The facts on which the statement is based and the specific statutory or regulatory requirement allegedly violated; and
- The signature of the complainant.

The Kentucky Department of Education is required to resolve the complaint in writing within a reasonable period of time. The state's resolution (or its failure to resolve the compliant within a reasonable period of time) may be appealed by the private school officials to the Secretary of the U. S. Department of Education (Secretary). The appeal to the Secretary must be filed no later than 30 days following the state's resolution of the complaint (or its failure to resolve the complaint within a reasonable period of time). The Secretary investigates and resolves the appeal not later than 120 days after receipt of the appeal.

PRIVATE SCH

Sample
Letter of Notification to Private Schools

Letter Head of District

Date:

Name and address of private school:

Dear (name of private school official if known):

This letter is our annual invitation for your school to participate in the (**district**) Title I, Part A program. Title I, Part A is a federally funded program that provides supplemental instructional services to eligible children who are attending public, private, or home schools. To be eligible to receive Title I, Part A services, a child must reside within the attendance area of a participating public school and be failing or at risk of failing student academic achievement standards. Children participating in the Title I, Part A program must be identified through a multiple criteria assessment as having an educational attainment that is below the level appropriate for their age. Certain other children may be identified as eligible solely by their status: for example, homeless children and children who in the preceding two years had participated in Head Start, Even Start, Early Reading First, or a Migrant Education program.

The amount of the funds available to provide this service in each public, private or home school is determined by the number of low-income children living in the participating Title I, Part A attendance area. For Title I, Part A purposes, low-income is defined as being eligible but not necessarily participating in the federally funded free or reduced lunch program. For private and home schools, the funds generated are available to provide instructional services to eligible student, their parents and teachers. The Title I law does not allow these funds or the equipment purchased with the funds to go directly to the private school or home school.

To ensure the Title I, Part A services are successfully meeting the educational needs of children, the Title I law requires that each participating child have a pre and post-test.

To facilitate Title I, Part A services to private and home schools, I would greatly appreciate your completing this short survey and returning it to me by (**date**). I have enclosed a stamped and self-addressed envelop for your convenience. If you have questions that you would like answered about the Title I, Part A program before you complete the survey, please call me at (**phone number**).

Sincerely,

Title I Coordinator

Name of private or home school: _____

_____ The school **would** like to participate in the Title I program during the (**school year**).

_____ The school **does not want** to participate in the Title I program during the (**school year**).

Name and Signature _____

Position _____

Address _____

Phone Number _____

SUGGESTED TIMELINE FOR CONSULTATION WITH PRIVATE SCHOOL OFFICIALS*		
MONTH	**DISTRICT ACTIVITY**	**EXPLANATION**
November/December Prior to next school year	Obtain complete list of all private schools with students who are residents of the district. Meet with private school officials to review timeline and consultation process and establish a consultation calendar and poverty data collection procedures.	This list serves as the basis for asking all private school officials if they want to have their eligible students participate in Title I programs during the next school year.
December thru February Prior to next school year	Obtain from principals or a central office serving a group of private schools the following poverty data (as appropriate) on private school students*: • Free and reduced priced lunch (District must use, if available) • Poverty survey that parents complete (District must extrapolate) • Alternative poverty data such as scholarships, TANF, Medicaid, etc. • Proportionality * Request only addresses and grade levels.	Private school students from low-income families who live in Title I participating public school attendance areas generate funds for instructional services.
February/March Prior to next school year	Match addresses of private school students from low-income families to participating public school attendance areas. Estimate the amount of funds generated for instruction using the same estimated per pupil amount as that used for public school students in participating public school attendance areas. Meet with private school officials to discuss poverty data results, amount of estimated instructional funds generated, and determine if funds will be pooled or not, or a combination of both options.	

MONTH	DISTRICT ACTIVITY	EXPLANATION
April/May Prior to next school year	Determine the multiple educationally related criteria used to select eligible students (educationally needy students who reside in Title I attendance areas) in consultation with private school officials. Private school officials provide lists of names, addresses, and grades of private school students who meet the criteria. District selects for Title I services those students most at-risk from these lists. Discuss with private school officials the needs of selected participants and appropriate Title I services to serve those needs. Design Title I services that serve participants' needs based on consultation. Determine with the private school officials the standards and annual assessments for measuring progress of the Title I program. Define annual progress. Determine criteria for making program modifications when annual progress is not achieved. Assess the achievement of the **current year's** program using the standards previously agreed upon. After appropriate consultation, make modifications to next year's Title I program, if annual progress has not been met.	Multiple educationally related criteria must meet the requirements in Section 1115(b) of Title I. Assessing the quality and effectiveness of the Title I program and, if appropriate, modifying the design of services provided to eligible students in private schools must be completed each year.

MONTH	DISTRICT ACTIVITY	EXPLANATION
May/June Prior to next school year	Determine in consultation with private school officials the professional development and parent involvement needs of private school teachers and families of participants. Design activities that district implements the next school year (independently or in conjunction with district activities) for teachers and families of participants. Inform private school officials of program design, service delivery models, number of Title I participants, allocations, and estimated costs. Provide opportunity for private school officials to comment. Update private school officials if there are any changes. Generate a list of students who will receive Title I services beginning in September of the next school year. Obtain written affirmation from private school officials or their representatives that timely and meaningful consultation has occurred. Complete all necessary Board reports, contract negotiations, ordering of material, hiring of teachers, etc.	Equitable services for teachers and families of participants apply to funds reserved under Sections 1118-1119. Districts must provide opportunities for consultation with private school officials if program is modified or private school officials request continued discussions. These actions ensure that programs will begin at the start of the school year. Consultation should be completed for the next school year prior to the district submitting its Title I report to the state.

PRIVATE SCH

MONTH	LEA ACTIVITY	EXPLANATION
August Prior to beginning of school year	Meet with private school officials to report on readiness of Title I program for private school students.	Private school officials should be aware of all facets of the program, including staffing, start time, status of equipment and materials, etc.
September of school year	Begin Title I services for eligible students identified the previous spring. Request a list of newly enrolled students who meet the eligibility criteria. Consult with private school officials on how new students can or can't be accommodated in Title I program. District provides private school officials with final lists of Title I programs, and Title I teachers. Implement professional development and parent involvement activities based on previous spring's consultation.	
October of school year	District provides private school officials with final lists of Title I students. Start planning for the next school year's consultation cycle.	

This is not an official U.S. Department of Education document.
It is provided only as an example.

PRIVATE SCH

Sample
Private School Students Eligibility List for Title I, Part A Services

Name of School _____ Title I Focus Area _____

Directions:

- List the names of all children **(from participating Title I, Part A public attendance areas)** who are failing or most at risk of failing to meet state standards in the focus area of Title I services. Economically disadvantaged, disabled, migrant and limited English proficient children are eligible on the same basis as other children.
- Remember also to include those children **(from participating Title I, Part A public attendance areas)** who are classified as: Homeless, received Head Start, Even Start, or Early Reading First services within the last two years.
- A ranking sheet for the focus area is then used to determine those children with the greatest need for assistance that will be served by Title I, Part A.

NAME	GRADE	NAME	GRADE

PRIVATE SCH

Sample 1 – Ranking of Eligible Private School Students for Title I, Part A Services

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **READING**

Rank child in each column using the following rating scale:
1-very low 2-low 3-low average 4-average 5-above average

Name of eligible child	Age or grade level	Sense of purpose for reading	Word recognition and analysis	Vocabulary or background for required tasks	Comprehension of written materials	Range of reading strategies	Awareness of audience and/or purpose in writing	Total *Lowest total is greatest academic need

* Other objective criteria such as diagnostic tests may be added.

PRIVATE SCH

Sample 2 – Ranking of Eligible Private School Students for Title I, Part A Services

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **Mathematics**

Rank child in each column using the following rating scale:
1-very low 2-low 3-low average 4-average 5-above average

Name of eligible child	Age or grade level	Selection and application of procedures	Computation and operational procedures	Problem solving strategies	Reasoning skills	Concept development: number sense, geometry, measurement other math content areas	Ability to write an explanation that has sufficient details	Total *Lowest total is greatest academic need.

* Other objective criteria such as diagnostic tests may be added.

SCIENTIFICALLY BASED RESEARCH STRATEGIES

NCLB, Title I, Part A and Title IX, Section 9101

WHAT ARE SCIENTIFICALLY BASED RESEARCH STRATEGIES?

NCLB. Title I, Part A and Title IX, Section 9101

Overview

Educational research is the formal, systematic application of the scientific method to the study of educational problems. Stated another way, educational research is a careful and diligent search for an answer. Not all research is the same, nor is all research scientifically based. This document includes information to help schools and districts determine if strategies and programs are based on scientifically based research. This is a condensed version of information provided by the National Clearinghouse for Comprehensive School Reform (NCCSR) and the American Institute for Research (AIR). NCCSR developed a process to analyze research studies and has very detailed information on the web. Schools are encouraged to review the information on the NCCSR web site at: www.csrclearinghouse.org/. Schools can send questions about the research basis of reform strategies being considered to: AskNCCSR@goodschools.gwu.edu. NCCSR will find the available research on particular strategies and make some comments about the quality of the research. Much of the information included in this document comes from these resources.

NCLB Definition

The definition for scientifically based research found in Title IX, Section 9101 of the No Child Left Behind Act (NCLB) states that the term scientifically based research means research that:

- Involves the application of rigorous, systematic, and objective procedures to obtain reliable and valid knowledge relevant to education activities and programs
- Employs systematic, empirical methods that draw on observation or experiment; involves rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn
- Relies on measurements or observational methods that provide reliable and valid data across evaluators and observers, across multiple measurements and observations, and across studies by the same or different investigators
- Is evaluated using experimental or quasi-experimental designs in which individuals, entities, programs, or activities are assigned to different conditions and with appropriate controls to evaluate the effects of the condition of interest, with a preference for random-assignment experiments, or other designs to the extent that those designs contain within-condition or across-condition controls; ensures that experimental studies are presented in sufficient detail and clarity to allow for replication or, at a minimum, offer the opportunity to build systematically on their findings
- Has been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous, objective, and scientific review

Components of Research Studies

The purpose of research is to understand a particular problem or the impact of an intervention. Interventions include the implementation of a program and/or practice. Each research study contains six specific components.

1. **Abstract** – 100-500 word summary of the study
2. **Objective** – describes what the researchers are trying to discover and includes the formal statement of the research question or hypothesis to be empirically investigated
3. **Research Procedures/Methodology** – identifies the research subjects; how data were measured and collected; and the methods of analysis used to reach the conclusions presented

4. **Findings** – provides the raw data and the analysis of the data
5. **Discussion Section** – provides the interpretation of the research findings
6. **Conclusion** – focuses on addressing the research question, hypothesis, or problem statement and asks if the study met the stated purpose

Analyzing Components of Research Studies

How researchers put components together is what determines the quality of a study and will determine how schools should read and examine research. It is important to recognize that different parts of a study will be relevant or applicable to varying degrees depending upon the questions the school has and where it is in the process of comprehensive school improvement.

1.) Abstract

The abstract is the first component a school should look at to determine the relevance of the study for the school. If the study is on a "math program" but the school's need is reading, one would know immediately that this study is not appropriate for the school. If the research design is not very rigorous, it may give an indication as to whether the study will really help to determine the quality of a program or practice for the school.

2.) Objective (Problem/Purpose)

This component of the research study helps the school determine what the study is about and describes what the researchers are trying to discover. It includes a research question or hypothesis and the purpose of the study. There are three different reasons to conduct a study:

- To test a theory
- To assess the implementation or replicability of a reform practice or program
- To test the impact or effectiveness of an intervention practice or program

3.) Research Procedures/Methodology

This component of the research study will help the school assess the quality or rigor of the study. The methodology should clearly identify the composition of the research (subject sample), the research design (how data were measured and collected), and the methods of analysis used to reach the conclusions presented.

When a school looks at the research *subjects*, the school should analyze the appropriateness of the subjects to determine if they are the best possible group to study to answer the research question. Also, the school should examine the number of subjects involved as the composition and the number of subjects will affect the quality and applicability of the study.

The research procedure also describes the research *design* and how the particular design is best suited to test the problem statement. The link between the research question and the method must be clearly indicated and justified by the researcher. No matter what method of analysis is used, the researchers must provide justification for using a particular method. Research designs fall into two major categories:

- Quantitative – the collection of numerical data in order to describe, explain, predict, and/or control a phenomenon of interest. The data analysis is mainly statistical and relies predominantly on a deductive approach. Quantitative research begins with a theory about a relationship that suggests certain data to collect. The data are collected and analyzed. Findings will either refute or support the theory. There are three types of quantitative research that serve a particular purpose and are employed based on what a researcher wants to know:
    - Descriptive studies - report the way things are; are used to summarize, organize, and simplify data

  - Experimental studies - test hypotheses by observing conditions or characteristics to show that changes in one are caused by changes in the other, controls all conditions, measures the change or difference that occurs as a result of manipulating an intervention or variable, and must include a pre-test and a post-test to measure these differences
  - Quasi-experimental - a form of experimental research where the researcher cannot control at least one of the three elements of the design (environment, assignment to experimental and control groups, intervention)
- Qualitative – the research is actually multi-method in focus and involves an interpretive, naturalistic approach to its subject matter. Researchers study things in their natural settings, attempting to make sense of, or interpret, phenomena in terms of meanings people bring to them. Qualitative inquiry often starts out with "how" or "what" questions and tries to make sense of and describe what is going on. Qualitative research collects observations and is descriptive. There are three types of qualitative research:
  - Historical – the systematic collection and evaluation of data related to past occurrences in order to describe the causes, effects, and trends of events that may help to explain present circumstances or anticipate future events
  - Ethnographic – the collection of extensive narrative data over an extended period of time in a natural setting
  - Case studies – an in-depth examination of one particular entity or case over time

4.) Findings

This component will provide the raw data and the analysis of the data. The results will indicate whether the research is "statistically significant," meaning the researchers found that the program or practice has made a difference and it was not by chance. It is important to look for findings that are statistically significant, that tells the school the treatment had an effect.

5.) Discussion Section

This component provides the interpretation of the research findings. The researcher identifies what can and cannot be concluded from the research and addresses the possible implications of the results. Researchers also connect the various aspects of their analysis, showing commonalities across groups, uniqueness where it exists, and inconsistencies in the results. Researchers should provide an honest appraisal of their work. They should also identify the limits of their findings, drawing attention to what is missing due to design or data analysis. Researchers should connect their work to the larger research world by highlighting what is and is not consistent with prior research.

6.) Conclusion

This component should provide much of the information the school needs to glean from research. It may be easier to review this section for most of the information the school needs about the study. Ultimately, what the school should look for in this section is whether the program or practice under investigation improved student achievement and, if it did, what conditions are necessary to reproduce those results. The conclusion should explain not only the study findings, but also the implications of the findings.

Judging the Quality of a Research Based Study

Schools may find all types of research useful in making decisions. However, in planning for Comprehensive School Reform, Title I, Part A or Title V, Part A funding, NCLB specifies that the research must demonstrate adequate proof of success and must come from *quantitative research studies* using an *experimental or quasi-experimental design*.

RESEARCH STR

To assist schools in analyzing research, two levels of standards (gold and silver) have been established for determining if a research study is scientifically based. Research of all kinds can help inform the school's work, whether or not it is seeking federal and state funds. Not all studies will meet the criteria established in NCLB for funding purposes. However, the school could use these studies to help decide which programs are most appropriate for the culture and climate of the school and implement them through other sources.

Gold Standard Research

- Experimental research
- The intervention (program/practice) studied and the outcome is clearly established (causality between treatment and student achievement/the practice works)
- Must control **all** conditions (environment, random assignment of subjects and intervention)

Silver Standard Research

- Quasi-experimental research
- Cannot determine causality
- Controls **all but one** of the conditions (environment, random assignment of subjects and intervention)

Evidence of Effects

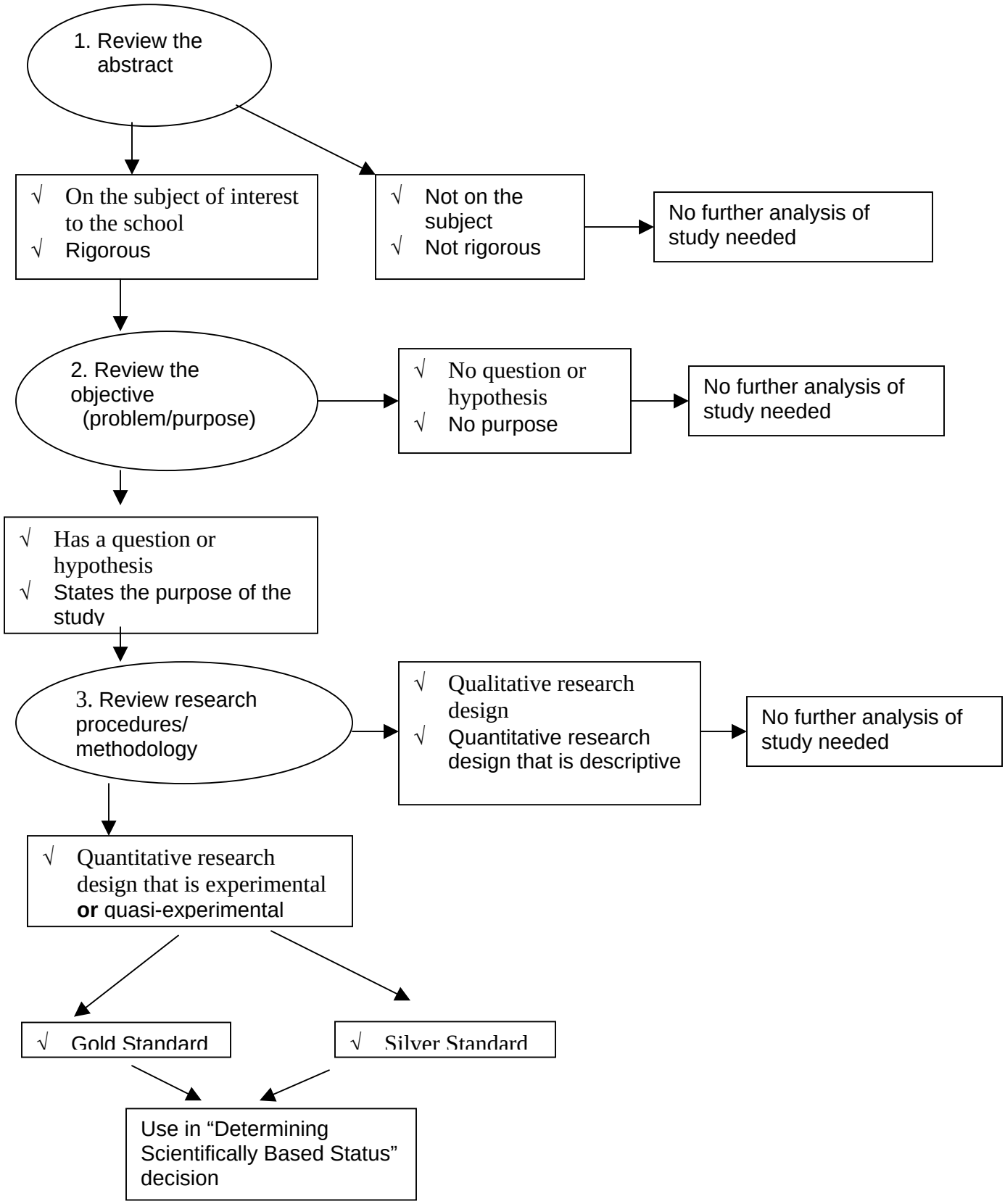
Determining the gold or silver standard of a research study meets one of the six criteria in the NCLB definition of scientifically based research (uses an experimental or quasi-experimental design). The school needs to judge the strength of the evidence for an instructional practice or reform model using all six criteria. Also, to be scientifically based, at least four gold and/or silver standard research studies for one instructional strategy or reform model should be reviewed. Schools should refer to the *Determining Scientifically Based Status* chart to assist in determining scientifically based research status.

Following is information regarding five of the six criteria outlined in NCLB. Since the criterion regarding experimental or quasi-experimental design has been discussed extensively in this document, it is not listed below.

- Employs systematic and empirical methods – to meet this criteria, researchers must establish a clear and justifiable link between the research question and the method employed to answer it
- Uses rigorous data analyses – to meet this criteria, the data must be adequately analyzed so the conclusions can be justified and usually includes statistical analysis of student achievement data and statistically significant findings
- Relies on measurements that provide reliable and valid data – to meet this criteria, data is considered **reliable** if a measure yields consistent results when taken under similar conditions and **valid** if a measure accurately predicts what it is designed to predict
- Provides detailed results that allow for replication – to meet this criteria, there must be a clear, detailed description of the method and have enough information to allow a different researcher to conduct the same study
- Results have been subjected to scrutiny – to meet this criteria, the study must have been reviewed by independent experts or accepted in a peer reviewed journal

RESEARCH STR

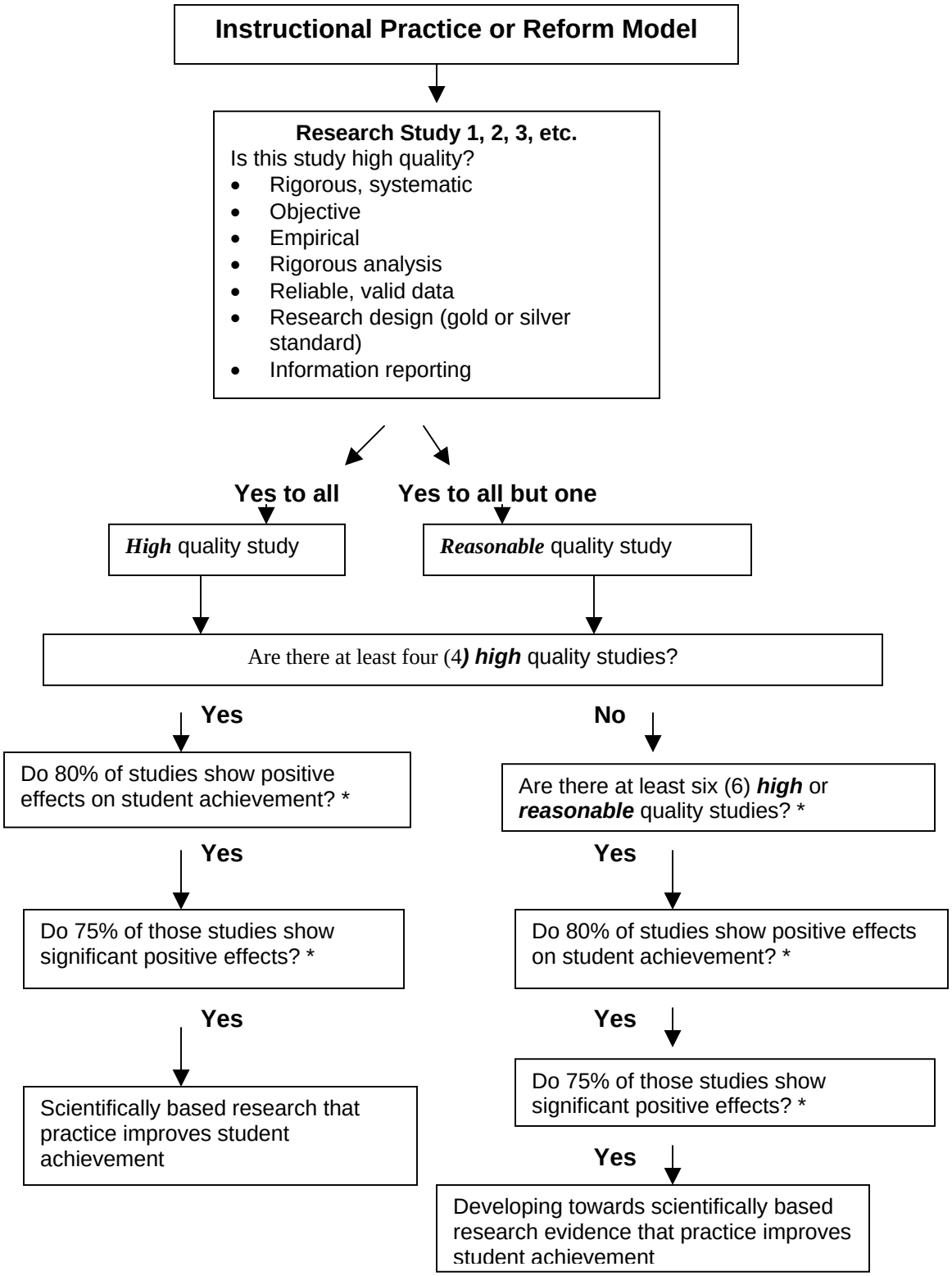
Judging the Quality of A Scientifically Based Research Study



RESEARCH STR

Determining Scientifically Based Status

This flow chart demonstrates the process for determining the scientifically based status of an instructional practice or reform model. At least four high or reasonable quality research studies should be used in making these decisions. Note: If any box in the chart with a (*) is answered **"no"**, the research study should **not** be considered scientifically based.



SCHOOLWIDE PROGRAM

NCLB, Title I, Part A, Section 1114

SCHOOLWIDE PROGRAM

NCLB, Title I, Part A, Section 1114

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Designing Schoolwide Programs* that may be found at http://www.ed.gov/policy/elsec/guid/edpicks

A schoolwide program includes all students enrolled in the school. Federal funds must be supplemental to state and local education funds; however services do not have to be supplemental to the regular education programs. The following ten components must be included in a schoolwide program.

1. A comprehensive needs assessment of the entire school (including taking into account the needs of migratory children) that is based on information that includes the achievement of children in relation to the State academic content standards and the State student academic achievement standards.
2. Schoolwide reform strategies that
   a. Provide opportunities for all children to meet the State's proficient and advanced levels of student academic achievement.
   b. Use effective methods and instructional strategies that are based on scientific research that
      - Strengthen the core academic program in the school;
      - Increase the amount and quality of learning time, such as providing an extended school year and before- and after-school and summer programs and opportunities, and help provide an enriched and accelerated curriculum;
      - Include strategies for meeting the educational needs of historically underserved populations.
   c. Include strategies to address the needs of all children in the school, but particularly the needs of low-achieving children and those at risk of not meeting the State student academic achievement standards who are members of the target population of any program that is included in the schoolwide program, which may include
      - Counseling, pupil services, and mentoring services;
      - College and career awareness and preparation, such as college and career guidance, personal finance education, and innovative teaching methods, which may include applied learning and team-teaching strategies;
      - The integration of vocational and technical education programs;
      - How the school will determine if such needs have been met. (Annual evaluation of the plan)
   d. Are consistent with, and are designed to implement, the State and local improvement plans, if any.
3. Instruction by highly qualified teachers.
4. High-quality and ongoing professional development for teachers, principals, and paraprofessionals (paraeducators) and, if appropriate, pupil services personnel, parents, and other staff to enable all children in the school to meet the State's student academic achievement standards.
5. Strategies to attract high quality highly qualified teachers to high-need schools.
6. Strategies to increase parental involvement, such as family literary services.

7. Plans for assisting preschool children in the transition from early childhood programs, such as Head Start, Even Start, Early Reading First, or a State-run preschool program, to local elementary school programs.
8. Measures to include teachers in the decisions regarding the use of academic assessments in order to provide information on, and to improve, the achievement of individual students and the overall instructional program.
9. Activities to ensure that students who experience difficulty mastering the proficient or advanced levels of academic achievement standards required by the state shall be provided with effective, timely additional assistance which shall include measures to ensure that students' difficulties are identified on a timely basis and to provide sufficient information on which to base effective assistance.
10. Coordination and integration of Federal, State, and local services and programs, including programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

SWP

SCHOOLWIDE PROGRAM REPORT

NCLB, Title I, Part A, Section 1114

School: School Year:

Name of Schoolwide Program Planning Committee Chairperson:

In the spaces below, briefly describe how the schoolwide program (SWP) assures that the ten required components are being covered. Title I does not have to fund all of the 10 components (other sources may fund some of the components) because federal, state and local resources are integrated in a schoolwide program. Federal funds must be supplemental to State and local funds; however services do not have to be supplemental to the regular education programs.

1. **Needs assessment covers whole school.** What data sources did the school use to plan the schoolwide program? What needs did the data identify? What specific grade levels and/or content areas were identified as a priority? What achievement gaps were identified?

2. **Schoolwide reform strategies.** What strategies, based on scientific research, will **all** teachers and paraeducators use? What is the program design and how is it correlated with the Program of Study and the core content? How does the program increase the amount and quality of learning time? How will the achievement gap be eliminated between various groups of students, including male and female students, students with and without disabilities, students with and without English proficiency, minority and non-minority students, and students who are eligible for free and reduced lunch and those who are not eligible? How will the special needs of low-achieving students be met? Was the schoolwide plan implemented as written? Were the strategies effective in increasing student achievement? Did student achievement meet the goals established in the plan?

3. **Instruction by highly qualified teachers.** Are all teachers certified in fields in which they are teaching? If not, what steps are being taken to ensure that **all** teachers will be highly qualified by the end of the 2006-97school year? What is the educational background of paraeducators? What steps are being taken to ensure that **all** paraeducators will meet the educational requirements by the end of the 2006-07 school year?

4. **Professional development.** What professional development (PD) is planned? How was the school's PD needs determined? How is the PD tied to the school's Comprehensive School Improvement Plan? How will the planned PD improve instruction? What makes the Pd offerings high quality and ongoing? How are principals, teachers, paraeducators and other appropriate personnel such as: health services coordinators; special education coordinators; and directors of Family Resource and Youth Service Centers included in the PD? How will the impact of the PD on student achievement be measured?

5. **Strategies to attract highly qualified teachers.** What strategies are used to recruit highly qualified teachers? What strategies are used to retain highly qualified teachers in the school?

6. **Parent involvement.** What will the school do to increase parental participation, such as offering family literacy services? How are parents included in their child's education? How are parents involved in the development of the school's parent involvement policy, evaluation of the parent involvement program and the learning compacts?

7. **Assists transition.** What will the school do to emotionally and academically ease student transition from early childhood programs to elementary school programs?

8. **Measures to include teachers in decisions.** How are all teachers included in the selection of academic assessments? How do all teachers participate in the analysis of data and the development of the overall instructional program in order to improve student achievement?

9. **Activities to ensure that students meet state standards.** How does the school provide effective, timely, and additional intervention to students in danger of not meeting state standards? How are students and their needs identified for assistance? How do teachers and paraeducators collaborate for planning and instruction?

10. **Coordination and integration of programs.** What Federal, State and local funds are made available to the school? How does the school coordinate and integrate Federal, State and local programs and services to improve instruction and increase student achievement?

What Research Findings Indicate About Effective Schoolwide Programs

The following concepts for effective schoolwide programs are based on educational research.

- All children's performances are negatively affected in schools with high concentrations of poverty.
- For the lowest achieving students in the highest poverty schools to meet high standards of performance, the school's entire instructional program, not just a separate Title I program, must be substantially improved.
- Educators in highly successful schools expect high academic achievement from every child.
- When an entire school is the target of change, schools serving disadvantaged youth can achieve success.

Common Characteristics of Effective Schoolwide Programs

Schoolwide programs must include the ten required components. An effective schoolwide program brings **all** federal, state and local resources together to improve the instructional program in order to impact student achievement. All federal, state and local resources address the ten components of a schoolwide program. Even though schoolwide programs vary from one school to another, effective schoolwide programs have the following characteristics.

Agreed-Upon Vision

All staff

- Share a common vision for all students.
- Make decisions based on a comprehensive needs assessment.
- Integrate the schoolwide plan in the Comprehensive School Improvement Plan.
- Coordinate resources from all Federal, State and local programs.

Academic Focus

All staff

- Focus on early childhood intervention.
- Use systematic, scientifically research based academic models that are matched to the needs of the students.
- Devise appropriate modifications and differentiate instruction to accommodate students' strengths and weaknesses.
- Integrates disciplines and specializations in thematic units, promoting reading and mathematics learning through explorations, writing, and problem solving around content themes.
- Use computers and other technology as instructional tools.
- Emphasize building student self-concept, cultural pride, and community identity.
- Use art, writing, reading and other integrated experiences for students to learn social studies and science through projects.
- Closely align professional development (PD) with school goals, needs assessment, and the Comprehensive School Improvement Plan.
- Visit other classrooms and discuss curriculum issues across grade levels/teams.
- Analyze student data to identify achievement gaps in subpopulations.

Management and Organizational Structure

All staff

- Are accountable for all students.
- Do not isolate Title I from the rest of the school.
- Intensify small group instruction within the classroom and assist classroom teachers to strengthen lessons.
- Are included in the planning and management phases.
- Manage programs by a committee that includes teachers, parents and administrators.

Project Design

All staff

- Deliberately design approaches emphasizing critical thinking skills.
- Design programs that include all disciplines in the academic program.

Parent Involvement

All staff

- Recruit and encourage parents to become partners in learning, actively engage parents in planning and learning and target school-parent programs to the needs of the community and families.
- Encourage parents to be more than volunteers; parents participate in planning, review, and evaluation of the program as well as school activities and organizations.
- Communicate with parents to maximize instructional time for students and foster a team effort.
- Follow a philosophy that school is a place where parents, as well as children, can learn and that entire families should use school facilities to meet their needs.
- Communicate information to parents through their native language.
- Provide examples of classroom events (video tapes, newsletters, open house, display of student work) for parents in order to broaden their understanding of the program.
- Provide transportation and childcare services for parents to participate in school activities.
- Develop partnerships with local businesses and community groups to foster successful schools.

Examples of Effective Program Design

The program design of a schoolwide program should reflect scientifically research based reform strategies that are directly aligned with the findings of the comprehensive needs assessment. The program design may vary to meet the different needs of grade levels and content areas in the school. All federal, state and local resources (staff, materials, labs, computers, professional development etc.) must be coordinated to improve student achievement. Title I should not be the only funding source for the schoolwide program. The following examples may be included in a school's program design.

1. Resource teachers to model effective instruction; provide on-going professional development; assist in strengthening lesson plans to reflect the core content and provide guidance on curriculum alignment. The teachers could address needs such as writing, reading in the content area and integrating arts/humanities and practical living into the classroom.
2. Content specialist in a computer lab to collaborate with the classroom teacher on using a

variety of strategies to answer open response items; developing writing prompts; using spread sheets and graphs; and finding computer programs that address higher level thinking skills. The content specialist could address identified needs such as writing, technical reading, reading comprehension and problem solving.

3. Science/math lab teacher to develop hands-on activities and experiments to enhance/expand instruction.
4. Extended kindergarten to provide early intervention that aligns with primary instruction.
5. Specific academic, research based models aligned with the school's needs assessment that provides early intervention strategies.
6. Total school restructuring efforts based on scientifically research based process models that are goal oriented and based on setting high expectations.
7. Software programs that coordinate with student performance standards and that expand higher-order thinking skills.
8. Parent coordinator to train teachers and parents, develop community partnerships and coordinate with family literacy programs and Family Resource & Youth Service Centers to help meet instructional needs of students.
9. Intersession programs for year round schools, summer school, expanded or extended day programs.
10. Classroom programs or scientifically research based models that improve students' academic achievement.

Using Other Federal Funds in a Schoolwide Program

The following are some examples of how funds from other federal programs may be utilized in a schoolwide program. The intent and purposes of the included programs must be met.

1. A secondary school may use funds received under the **Carl D. Perkins Vocational and Technology Education Act** to support its schoolwide program if its program improves vocational education in the school, for example by integrating academic and vocational education, and its program improves access to vocational education for special populations in the school.
2. A schoolwide program school may use funds received under **Title II, Part A, Teacher and Principal Training and Recruiting Fund** to provide the school with a sustained and intensive high-quality professional development program for school staff in core academic subjects that is aligned with Kentucky's content and performance standards, that reflects recent research on teaching and learning, and incorporates methods and practices to meet the educational needs of diverse student populations.
3. A schoolwide program school may use funds received under **Title IV, Part A of the Safe and Drug-Free Schools and Communities** program provided the school has a comprehensive drug and violence prevention program designed for all students and employees to create a disciplined environment conducive to learning, prevent violence and promote school safety, prevent the use, possession, and distribution of tobacco, alcohol, and illegal drugs by students, and prevent the illegal use, possession, and distribution of those substances by employees.
4. A school may use funds received under **Title III, Language Instruction for Limited English Proficient and Immigrant Students** to support its schoolwide program provided the program implements a bilingual education or special alternative instruction program that

reforms, restructures, and upgrades the programs and operations that serve limited English proficient children and youth in the school.

5. A school may use funds received under **Title V, Part A, Innovative Programs** to support local education reform efforts that are consistent with Kentucky's education reform efforts, implement promising educational reform programs that are based on scientific research, meet the needs of at-risk youth, provide library and instructional and media materials and improve school, student, and teacher performance.

Research Findings

A research team for the Thomas B. Fordham Foundation studied forty schools with similar demographics. Thirty of the sites demonstrated rapid growth on standards based tests while ten showed little or no progress. Researchers found that, regardless of outside variables such as family income, a school could improve student learning when its faculty worked as a team, implemented core content instruction and was not shy about self-evaluation. Following are some highlights from their findings.

1. Schools whose scores did not increase added on new programs or materials that affected some teachers and not others and did not lead to a more unified schoolwide approach.
2. Schools whose scores did not increase were generally less focused on core content and more reluctant to eliminate activities that teachers enjoyed but were not clearly productive.
3. The improving schools made sure that teachers at every grade level were coordinating their efforts.
4. Improving schools took much more initiative to find and use professional development programs designed to remedy their particular instructional weaknesses and prioritized the use of their professional development time to support the school improvement plan.
5. Improving schools were much more likely than other schools to reach out to parents, explaining state tests and the need for improved performance and asking for help at home with reading and checking homework.

Schoolwide Program Planning
Completing Planning Charts

1. Provide the school or school council with any available student data (such as the Kentucky Performance Report (KPR), the No Child Left Behind (NCLB) Report, achievement gap data, comprehensive school improvement plan, scholastic review or self-study).
2. Title 5 chart papers (from the Charts for SWP Planning).
3. Once the group has reviewed the data, have someone scribe for the group and complete the first chart titled *What Does the Data Say about Our Students*? Facilitator should ask questions as needed (such as: What does the NCLB Report show regarding the progress of subpopulations toward scoring proficient or above for reading and mathematics?).
4. Have the group reflect on the data and determine what the priority needs are from the data on the first chart. Complete the second chart *What Do We Tackle First? Priority Needs*.
5. Have the group review their CSIP and scholastic review/self-study to determine what the school currently has in place that would address the priority needs. Complete the third chart *What Do We have in Place to Address Priority Needs*?
6. Have the group determine what additional strategies or programs are needed to address the needs. Complete the fourth chart *What Else Do We Need*?
7. Have the group look at the Schoolwide Program (SWP) components and determine what components of a SWP have been addressed on the charts and what components still need to be addressed. Complete the fifth chart noting what components are addressed and what need to be addressed.
8. Working through this process will assist the school/council in planning a new SWP or refocusing an existing SWP to become more effective in improving the instructional program of the school and increasing student achievement.
9. Use the notes from the charts to complete the SWP Report.
10. If few SWP components are addressed, the group should look at the TAS report and determine if the school should be a SWP or a TAS.

SWP

CHARTS FOR SWP PLANNING

What Does the Data Say about Our Students?	What Do We Tackle First? (Priority Needs)	What Do We Have in Place to Address the Priority Needs?	What Else Do We Need?	SWP Plan

TARGETED ASSISTANCE SCHOOL

NCLB, Title I, Part A, Section 1115

TARGETED ASSISTANCE SCHOOL

NCLB, Title I, Part A, Section 1115

Currently there is no guidance from the U.S. Department of Education about targeted assistance schools.

A targeted assistance program must provide supplemental services for participating Title I children. The following eight components must be included in a targeted assistance program.

1. Use Title I resources to help participating children meet the State's challenging student academic achievement standards expected for all children.
2. Ensure that planning for students served is incorporated into existing school planning.
3. Use effective methods and instructional strategies that are based on scientifically based research that strengthens the core academic program of the school and that
   - Give primary consideration to providing extended learning time, such as an extended school year, before- and after-school, and summer programs and opportunities;
   - Help provide an accelerated, high-quality curriculum, including applied learning;
   - Minimize removing children from the regular classroom during regular school hours for instruction provided under Title I.
4. Coordinate with and support the regular education program, which may include services to assist preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First or State-run preschool programs to elementary school programs.
5. Provide instruction by highly qualified teachers.
6. Provide opportunities for professional development with Title I resources, and, to the extent practicable, from other sources, for teachers, principals, and paraprofessionals (paraeducators), including, if appropriate, pupil services personnel, parents, and other staff, who work with participating children in programs under Title I or in the regular education program.
7. Provide strategies to increase parental involvement, such as family literacy services.
8. Coordinate and integrate federal, state, and local services and programs, including programs supported under the No Child Left Behind Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

TAS

TARGETED ASSISTANCE SCHOOL REPORT

NCLB, Title I, Part A, Section 1114

School: School Year:

Name of Targeted Assistance School (TAS) Planning Committee Chairperson:

In the spaces below, briefly describe how the targeted assistance program assures that the eight required components are being covered. Title I services and funds must be supplemental to the regular education program.

1. **Activities to ensure students meet state standards.** How are Title I resources used to provide effective, timely, and supplemental intervention to participating Title I students in danger of not reaching proficiency? How is the progress of students evaluated on an ongoing basis? How are the TAS services revised, based on on-going evaluations, to provide additional assistance to enable students to reach proficiency?

2. **School planning.** What data sources did the school use to develop the TAS services? What needs were identified based on the data? What focus/content areas are targeted for the Title I services, based on these identified needs? What grade levels did the data identify to be served by Title I? Who was involved in the planning of the TAS program? How are supplemental instructional services provided to participating Title I students? Are the Title I services of sufficient size and scope to provide quality supplemental instruction to participating students?

3. **Effective methods and instructional strategies.** What scientifically based strategies will Title I teachers and paraeducators be using? How will the achievement gap be eliminated between various groups of participating students, including male and female students, students with and without disabilities, students with and without English proficiency, minority and non-minority students, and students who are eligible for free and reduced lunch and those who are not eligible? How will the special needs of low-achieving Title I students be met? What extended opportunities are available for participating Title I students, i.e. extended school year, before school tutoring, after school tutoring, summer school? How are participating Title I students provided supplemental instruction to minimize removal from regular classrooms during regular school hours?

4. **Coordinate and support regular program.** What will the school do to emotionally and academically ease participating Title I students' transition from early childhood programs to elementary school programs? How do the Title I supplemental services coordinate with the regular education programs? How do Title I staff and regular education staff jointly plan, on a regular basis, to meet the academic needs of the identified Title I students.

5. **Instruction by highly qualified teachers.** Are Title I **teachers** certified in the fields/grade levels in which they are teaching? If not, what steps are being taken to ensure that the Title

I teachers will be highly qualified by the end of the 2005-06 school year? What is the educational background of Title I **paraeducators**? What steps are being taken to ensure that Title I paraeducators will meet the educational requirements by the end of the 2005-06 school year?

6. **Professional development.** What professional development (PD) is planned to improve the instruction in the focus/content areas for Title I and other staff (those working directly with participating Title I students)? How were the PD needs determined and tied to the Comprehensive School Improvement Plan? What makes the PD that is offered high quality and ongoing? How will the impact of the PD on participating Title I student achievement be measured?

7. **Parent involvement.** What will the school do to increase involvement of participating Title I students' parents, such as offering family literacy services and using technology? How are parents of participating students included in appropriate PD? How are parents of participating Title I students involved in the development of the school's parent involvement policy, evaluation of the parent involvement program and the learning compacts? What PD will teachers and other staff receive on how to reach out to, communicate with and work with parents of participating Title I students to build ties between parents and the school? How do Title I staff collaborate with the Family Resource/Youth Service Center staff?

8. **Coordination and integration of programs.** How does the school coordinate and integrate Federal, State, and local program funds to improve instruction and increase student achievement for participating Title I children?

Collaboration in a Targeted Assistance School

NCLB, Title I, Part A Section 1115

Effective Approaches

In-class model: The Title I, Part A funded personnel collaboratively teaches with the regular classroom teacher in order to directly benefit children identified for Title I, Part A services. The focus of collaboration is continuous interaction between classroom and Title I, Part A funded staff to provide appropriate instructional opportunities for all students.

The regular classroom teacher helps all children develop skills, concepts and processes in a particular content area that will enable them to meet the academic expectations. The Title I, Part A funded teacher or paraeducators supports and reinforces the skills and strategies with identified students. The two staff members work together to ensure that identified students learn skills, strategies and concepts that will enable them to be successful.

Suggestions for effective collaboration include:

- Regular and on-going collaborative planning between the regular classroom teacher and the Title I, Part A funded staff
- Building an atmosphere of mutual trust between staff members
- Creating a shared vision of how the staff can work together
- Agree upon the mechanics of working together
- Planning lessons that utilize the talents of the staff
- Planning lessons that provide extra benefits to low-achieving students
- Cooperatively solving problems that arise
- Assessing and addressing the special needs of individual students
- Flexibility in delivering Title I, Part A services

Title I, Part A funded staff may collaboratively teach with regular classroom teachers as long as the effort directly benefits participating children. Targeted students must always receive instruction from the regular classroom teacher. Pullouts may not be routinely scheduled and may not be the only service provided. Title I, Part A services must supplement and support the regular educational program.

Limited Pull-out Programs: The *No Child Left Behind Act* requires instructional services to be provided by minimizing the removal of Title I, Part A participants from the regular classroom during the regular instructional day. It is Kentucky's position that pulling children from the regular classroom may be allowed only under limited circumstances. The following are the only allowable limited pullout strategies: (1) research-based instruction such as Reading Recovery that requires intensive one-on-one strategies in another setting and (2) elective classes for middle or high schools. Schools must determine the needs of their identified students and then implement the most effective instructional strategies to meet those needs.

A **limited** pullout program provides instructional services for participating children in a different setting and a different time than would be the case if those children were not participating in Title I, Part A. A limited pullout program meets the supplement, not supplant requirement if all of the following characteristics are met:

1. The project is particularly designed to meet participants' special educational needs.
2. The classroom teacher, who would be responsible for the provision of instructional services to participating children in the absence of Title I, Part A, remains responsible for, and

continues to perform, those duties the teacher would be required to perform in the absence of Title I, Part A, including planning the instructional program of the participating children, providing them with instructional services, and evaluating their progress.

3. Paraeducators paid with Title I, Part A funds work closely with the regular classroom teacher, who is ultimately responsible for the provision of instructional services to participating children in the absence of Title I, Part A, so as to provide services that are particularly designed to meet participants' special educational needs.
4. Participating students pulled from the regular classroom are receiving additional services from the Title I, Part A staff. Title I, Part A cannot take the place of instruction that is provided by the regular classroom teacher. For example, a student receiving Title I, Part A services in reading cannot be pulled from the regular reading class to receive Title I, Part A services because Title I, Part A would then be taking the place of the regular classroom instruction. This is an example of supplanting.

Responsibility in Collaboration

School districts have the authority to strengthen, but not lessen, the Title I, Part A law by developing policies that further define the role of Title I, Part A staff in collaboration. For example, some districts have already established a policy that Title I, Part A staff jointly plan and provide services within the regular classroom setting 100% of the time.

School councils may not supersede Title I, Part A law. For example, the council may not establish a policy requiring Title I, Part A staff to provide only pullout services. The council may strengthen, but not lessen, the law and/or district policy. The school district is responsible for compliance of the Title I, Part A program.

TAS

Selecting Students for Title I Services in a Targeted Assistance School

NCLB, Title I, Part A, Section 1115

Title I Services: A Title I Targeted Assistance School (TAS) must use funds only to provide **supplemental services for children identified as in greatest academic need of assistance**. The goal of a targeted assistance school is to improve teaching and learning to enable Title I participants to meet the state's challenging academic standards that all children are expected to master.

Identification and Selection of Students: Each school conducting a targeted assistance program must identify the lowest-achieving children for participation in the Title I program.

1. **Needs Assessment** – A school must conduct a comprehensive needs assessment as a part of its Comprehensive School Improvement Plan to determine priority needs. Based on these priority needs, the Title I focus area(s) is determined.
2. **Eligible Population** – The eligible population for Title I services is
   - Children not older than age 21 who are entitled to a free public education through grade 12; and
   - Children who are not yet at a grade level at which the local educational agency provides a free public education.
3. **Eligible Children** – From the population described above, a targeted assistance school identifies children eligible for Title I services who are
   - Children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards;
   - Children from preschool through grade 2 selected solely on the basis of criteria such as teacher judgment, interviews with parents, and developmentally appropriate measures;
   - Children who are economically disadvantaged, children with disabilities, migrant children or limited English proficient children, are eligible for Title I services on the same basis as other children selected to receive Title I services;
   - Children who, at any time in the 2 years preceding the year for which the determination is made, participated in a Head Start, Even Start, or Early Reading First program, or in preschool Title I services;
   - Children who, at any time in the 2 years preceding the year for which the determination is made, received services under the migrant program;
   - Children in a local institution for neglected or delinquent children and youth or attending a community day program for such children;
   - Children who are homeless and attending **any** school served by the local educational agency.
4. **Children Selected for Title I Services** – From the eligible children, a targeted assistance school selects children for Title I services on the basis of multiple, educationally related, objective criteria established by the district and supplemented by the school.
   - Classroom teachers rate only the eligible students in the focus area identified by the needs assessment. Sample ranking sheets are attached. Revise the ranking sheet for different ability levels and to fit the school's needs.
   - Developmental checklists or other screening instruments may be substituted for the ranking sheets in order to more effectively assess the needs of kindergarten-primary 3 (formerly grade 2) students. These checklists may include such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.
   - The children who are in greatest academic need of assistance are provided Title I services.
   - Each school should keep this data on file. The district Title I coordinator should keep a copy of the school's student ranking data.

Note**:** Title I funds may **not** be used to provide services that are otherwise required by law to be made available to children in a targeted assistance school. Title I funds may be used to coordinate or supplement such services.

TAS

Student Eligibility List for Title I, Part A, Services in a Targeted Assistance School

Name of School _____Title I Focus Content Area _____

Directions: List the names of all students who scored or are **performing** at a novice or apprentice **level** in the content area on which Title I services will focus. Economically disadvantaged, disabled, migrant and limited English proficient students are eligible on the same basis as other children. Remember also to include those students who are classified as homeless or who received Head Start, Early Reading First, or Even Start services within the last two years or is in a neglected or delinquent institution. A ranking sheet for the content area is then used to determine those students with the greatest need for assistance that will be served by Title I.

NAME	AGE/GRADE	NAME	AGE/GRADE

TAS

Sample 1 – Ranking of Eligible Students in a Targeted Assistance School

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **Reading**

Rank child in each column using the following rating scale:
1-very low 2-low 3-low average 4-average 5-above average

Name of eligible child	Age or grade level	Sense of purpose for reading	Word recognition and analysis	Vocabulary or background for required tasks	Comprehension of written materials	Range of reading strategies	Awareness of audience and/or purpose in writing	Total *Lowest total is greatest academic need

Other objective criteria such as diagnostic tests may be added.

TAS

Sample 2 – Ranking of Eligible Students in a Targeted Assistance School

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **Mathematics**

Rank child in each column using the following rating scale:
1-very low 2-low 3-low average 4-average 5-above average

Name of eligible child	Age or grade level	Selection and application of procedures	Computation and operational procedures	Problem solving strategies	Reasoning skills	Concept development: number sense, geometry, measurement other math content areas	Explanation that has sufficient details	Total *Lowest total is greatest academic need.

* Other objective criteria such as diagnostic tests may be added.

TAS

Sample 3 – Ranking of Eligible Students in a Targeted Assistance School

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **Social Studies**

Rank child in each column using the following rating scale:
1-very low 2-low 3-low average 4-average 5-above average

Name of eligible child	Age or grade level	Democratic principles and economic principles	Forms of government	Reasoning skills; Problem solving skills using relevant examples	Compare/contract identify causes, analyze and think chronologically	Broad knowledge of KY and US in government & civics; culture & society; economics; geography; historical perspective	Communication of ideas or concepts in an organized way	Total *Lowest total is greatest academic need.

* Other objective criteria such as diagnostic tests may be used.

TAS

Sample 3 – Ranking of Eligible Students in a Targeted Assistance School

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **Science**

Rank child in each column using the following rating scale:
1-very low 2-low 3-low average 4-average 5-above average

Name of eligible child	Age or grade level	Science process/ inquiry skills	Patterns & systems & the ways their components work together or affect each other	Concept of scale & scientific models to explain organization & functioning of living & nonliving things	Critical thinking skills: compare, contact, classify	Factors that influence change	Communication skills by organizing information, representing data in different ways	Total *Lowest total is greatest academic need.

* Other objective criteria such as diagnostic tests may be used.

DISTRICT PLANNING

DISTRICT PLANNING

The following information is about district planning for 2006-07.

Requirement	Compliance
District Assurances	Superintendent e-mail that includes the "Declaration of Compliance" statement below as the text of the e-mail. This e-mail must be sent to the "KDE Assurances" mailbox on the Global Address List by **June 30** of each year. This is the only requirement to release federal and state funds.
Comprehensive District Improvement Plan (CDIP)	Posted on the district website and updated at least annually, based on the district planning cycle. Please include (Updated XX/XX/XXXX) at the end of the link you post on the district's website. The CDIP should be based on the district's comprehensive needs assessment. There are no requirements to include specific categorical programs in your CDIP unless they fit with your district's priority needs. **Note: Schools/Districts that are in NCLB consequences or are not in compliance with State statutes may have specific requirements that must appear in school improvement plans.**
Planning Cycle Determination	Include the district's planning cycle in the district planning policy.
MUNIS Budgets Posted to Web by Grant and By Location	NO LONGER A REQUIREMENT
Categorical Program Reports (i.e. Title I Ranking Report)	Districts will still comply with requirements regarding these reports.
MUNIS Quarterly Expenditure Reports	Electronically submitted each quarter by the 25th of the month following the close of the quarter. These reports will serve to verify both acceptable expenditures and grant budgets.

DECLARATION OF COMPLIANCE
(TO BE COPIED IN AN E-MAIL AND SENT TO "KDE ASSURANCES")

As Superintendent of the _____school district, I declare that all the schools in our district (including private schools receiving funding from our district) are in compliance with all of the assurances listed in the KDE "District Assurances" document. These assurances were approved at a regular meeting of the _____Board of Education on _____.
The approval is contained in the Board minutes that are available for review at the district's central office. All pertinent information related to these assurances is available for review at the district's central office."

SCHOOL COUNCILS AND TITLE I

NCLB, Title I, Part A, Sections 1001, 1113, 1114, 1115, 1116

SCHOOL COUNCILS AND TITLE I

NCLB, Title I, Part A, Sections 1001, 1113, 1114, 1115, 1116

Introduction

Title I, Part A of the *Elementary and Secondary Education Act* (ESEA), as amended by the *No Child Left Behind Act* (NCLB), is designed to help disadvantaged children reach high academic standards. School councils and district administrators must work together to accomplish this purpose. The purpose can be accomplished by:

1. Closing the achievement gap between high and low performing students, especially the achievement gaps between minority and non-minority students and between disadvantaged and their more advantaged peers;
2. Holding schools, local educational agencies and states accountable for improving the academic achievement of all students;
3. Providing greater decision making authority and flexibility to schools and teachers in exchange for greater responsibility for student performance; and
4. Promoting schoolwide reform and ensuring the access of children to scientifically based instructional strategies and challenging academic content.

Ranking of Schools for Eligibility and Selection

The district must use Title I funds only in schools that have been selected for services through allowable procedures. The district ranks the schools based on the percent of low-income children residing in that particular attendance area or enrolled in that school. The district must serve schools above 75% low-income in rank order regardless of grade span. If additional funds remain, the district may then continue on with the ranking by the district as a whole or rank remaining schools by grade span groupings.

District Set-Asides

Before distributing funds to participating schools, the district may reserve funds at the district level. Because the reservation of funds by a district will reduce the funds available for distribution to participating schools, the district must consult with teachers, pupil service personnel, principals and parents of children in participating schools in deciding district set-asides. District set-asides must not be used to benefit one school over another by circumventing the per pupil amounts allocated to schools.

School Allocation

Each school that receives Title I services is to be notified of its Title I allocation. The Title I allocation for each participating school is based on the per pupil amount times the number of low-income students in the school. It is suggested that the district Title I coordinator attend a council meeting to discuss the school allocation. The allocation is based on the total number of children from low-income families in the school. The schools in the district are rank ordered in terms of percent of low-income with the highest poverty school receiving services first. The fiscal control (finance and records) of the Title I program must be maintained at the district level. The district Title I coordinator must approve Invoices using Title I funds.

Role of District Program Administrators and the Role of the School Council

Title I services must be designed and implemented according to federal law. The school council may have considerable decision-making authority in the design and implementation of the school's Title I program within the confines of the Title I law and regulations. The role of the district Title I coordinator is to consult with the schools on a continuing basis in regard to making decisions which ensure high standards for all children. The coordinator advises school councils on Title I laws and regulations. The coordinator and the school council must work closely in the administration of the school's Title I program. The district Title I coordinator has the responsibility to monitor all Title I programs to ensure compliance, as well as the implementation of highly effective programs. There are two types of programs under Title I, Part A that are operated at the school level:

1. Schoolwide Program – A local educational agency may consolidate and use Federal, State, and local funds to upgrade the entire educational program of a school in which at least 40 percent of the children are from low-income families. The schoolwide program must be developed in consultation with the district program administrators and with the involvement of parents, other members of the community, teachers, principals and other school staff. In a secondary school, students must be involved in planning the schoolwide program.
2. Targeted Assistance School – In a school receiving Title I funds that is ineligible for a schoolwide program or that chooses not to operate a schoolwide program, a local educational agency may use Title I funds only for programs that provide services to participating children identified as having the greatest academic need.

The *No Child Left Behind Act of 2001* (NCLB) requires a comprehensive needs assessment to be conducted by each school based on the performance of children in relation to Kentucky's standards. The design of the Title I program must be based on the results of the needs assessment and effective research-based instructional practices. Both schoolwide programs and targeted assistance schools are included in the Comprehensive School Improvement Plan. District-level program coordinators are required to be a part of the team that reviews the Comprehensive School Improvement Plan for compliance and effectiveness. The plan is then subject to approval by the school council. While all of the components of a schoolwide program or a targeted assistance school may not be written into the Comprehensive School Improvement Plan, they must be a part of the program design. The school should complete the Comprehensive School Improvement Planning Report for schoolwide programs or the report for targeted assistance schools.

Title I Funded Personnel

Assignment of personnel to implement Title I services must be based on the results of the school's needs assessment. A schoolwide program and a targeted assistance school are required to provide instruction by highly qualified staff. The principal has the authority to reassign Title I personnel within the school as long as it is within the parameters of the Title I budget and the requirements of the Title I program. The council may not transfer or recommend transfers of the Title I staff to other schools. If a school is no longer served by Title I, the district is to reassign the personnel according to local district policies and state law.

COMPLAINT PROCEDURE FOR TITLE I, PART A

NCLB Section 9304

PROCEDURE FOR ENSURING PROMPT RESOLUTION OF COMPLAINTS OF VIOLATIONS OF TITLE I, PART A

NCLB Section 9304

NCLB requires the adoption of a written procedure for the receipt and resolution of complaints alleging violations of Title I, Part A in the administration of the program. The district procedure must include the following:

1. The complaint must be in writing and addressed to the district Title I Coordinator. The complaint must contain the following:
   - The name of the complainant and contact information;
   - The nature of the complaint (the specific violation of the administration of the Title I, Part A program).
2. The Title I Coordinator must maintain a complaint log. The log must include the following:
   - The name of the complainant;
   - The receipt date of the complaint;
   - The log-in number assigned to the complaint for tracking purposes;
   - The name of the staff to whom the complaint will be referred (if applicable).
   - The date of the response to the complaint.
3. The Title I Coordinator must respond to the complaint within thirty (30) working days upon receipt of the complaint.
4. The Title I Coordinator must maintain a copy of the complaint, log, and response on file in the district office.
5. After the complainant has received a response from the Title I Coordinator, the complainant has 30 days to appeal the local decision. This appeal must be filed in writing with the Kentucky Department of Education in compliance with (704 KAR 3:365).

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ALLOCATION PROCEDURE FOR TITLE I, PART A

NCLB Title I, Part A, Sections 1124 – 1125A

Title I, Part A allocations provide financial assistance to school districts for services that improve the teaching and learning of children at risk of not meeting challenging academic standards, especially those children who reside in areas with high concentrations of children from low-income families. The following information explains how allocations for Title I, Part A are calculated.

Formula Children

The U.S. Department of Education bases the Title I, Part A allocations on the number of formula children in each district along with updated state per-pupil expenditure data. Formula children are defined as:

- Children ages 5-17 residing in the geographic boundaries of the school district **from families below the poverty level** identified from **census data** compiled by the U.S. Department of Commerce. Census poverty children comprise the greatest portion of formula children. The U.S. Department of Education uses updated Census estimates to calculate Title I allocations.
- Children ages 5-17 **in licensed facilities for foster children** updated **annually** by the Kentucky Cabinet for Families and Children and reported to the U.S. Secretary of Health and Human Services. This is the number of children living in foster care for at least 30 consecutive days, at least one day of which was in the month of October.
- Children ages 5-17 **in local institutions for neglected children** reported **annually** by the Kentucky Department of Education to the U.S. Department of Education. This is the number of children who resided in an institution for neglected children for at least 30 consecutive days, at least one day of which was in the month of October.

An increase in the number of formula children does not necessarily mean an increase in the district Title I allocation.

Grants that Make Up the Title I, Part A Allocation

Districts that meet the requirements will receive (up to) four funding grants: Basic Grants, Concentration Grants, Targeted Grants and Education Finance Incentive Grants (EFIG). In calculating Basic, Concentration, Targeted, and Education Finance Incentive Grant allocations for local educational agencies (LEAs), the U.S. Department of Education uses updated census estimates of the number of related children ages 5-17 in families in poverty, the total school-age population, and the total resident population for each LEA. In addition to the census data, these allocations factor in updated state per-pupil expenditure data and data on the number of children in locally operated neglected or delinquent institutions and foster homes. The grants make up the Title I, Part A allocation and are **not** accounted for separately.

1. **Basic Grants** – To be eligible, a district must have at least 10 formula children **and** the number must exceed 2% of its total 5-17 population.
2. **Concentration Grants** – To be eligible, a district must have more than 6,500 formula children **or** more than 15% formula children of its total 5-17 population.
3. **Targeted Grants** – To be eligible, a district must have at least 10 formula children (without weights) **and** the number must exceed 5% of its total 5-17 population. The number of formula children are adjusted to give greater weight to those LEAs with higher numbers or percentages of formula children.
4. **Education Finance Incentive Grants (EFIG)** – To be eligible, a district must have at least 10 formula children (without weights) **and** the number must exceed 5% of its total 5-17 population. In addition to using the number of Title I formula children and each state's per-

pupil expenditures, the EFIG formula distributes funds to states based on (1) an effort factor that measures a state's effort to provide financial support for education compared to its relative wealth as measured by its per capital income, and (2) an equity factor that measures the degree to which education expenditures vary among school districts with a state. The EFIG formula benefits states that spend more money on education relative to their wealth and states that have a greater degree of equalized education expenditures among their LEAs. Once a state's EFIG allocation is determined, funds are allocated among LEAs within a state using a weighted formula that is similar to the Targeted Grants formula. The within-state weights used for determining LEA allocations vary among states according to the degree to which each states' expenditures are equalized across its school districts.

Hold-Harmless Provisions

All four grants provide for a variable hold-harmless guarantee for each district. The hold-harmless percentage depends on the formula child rate of each district. For Basic, Targeted and EFIG, a district must meet the eligibility criteria in order for hold-harmless protection to apply with one exception. For the Concentration Grant, the hold-harmless provision applies to a district for 4 years even if it no longer meets the eligibility criteria. There is no hold-harmless protection if a district is no longer eligible for the Basic Grant, Targeted Grant or EFIG. The hold-harmless percentage will help the district with the minimum amount. As long as the state receives enough Title I, Part A funds to hold each district at the appropriate hold-harmless percent, no district will receive:

- Less than 95 percent of its previous year's allocation if the number of formula children constitutes 30% or more of the district's ages 5-17 population;
- Less than 90 percent of its previous year's allocation if the number of formula children is between 15% - 30% of the district's ages 5-17 population;
- Less than 85 percent of its previous year's allocation the number of formula children is less than 15% of the district's ages 5-17 population.

For the Concentration Grant, the hold-harmless provision applies to a district for four years even if it no longer meets the eligibility criteria. The four years would start counting from when the district was eligible (above 15% formula count). A district would receive the concentration grant for four years. If the district becomes eligible within the four years, the four years start over.

If a state did not receive enough funds to hold each district at the appropriate hold-harmless percent, then all district allocations would be ratably reduced.

Role of State Education Agency

Before districts receive the Title I, Part A allocations, the Kentucky Department of Education must adjust each grant that makes up the Title I, Part A allocation:

- Reserve 1% for state administration.
- Reserve 4**%** for school improvement; 95% of the 4% must be allocated to districts that have schools in need of improvement. (For 2001-02 and 2002-03, 2% was reserved.) When reserving funds for school improvement, the state must ensure that no district receives less in total under Title I, Part A than it received in the prior year.
- If needed, use the sliding scale hold-harmless percentages to adjust the total allocation. For districts that are no longer eligible for the Targeted Grant and the Education Finance Incentive Grant, the hold-harmless percentage is based on the previous year's Basic Grant only.

TRANSFERABILITY OF FEDERAL FUNDS

NCLB, Title VI Section 6123

The No Child Left Behind Act (NCLB) increases the flexibility with which districts may use their federal funds. NCLB authorizes a district not identified for improvement under Title I to **transfer up to 50 percent** of each fiscal year's funds for applicable programs among certain federal programs. A district identified for improvement under Title I may **only transfer up to 30 percent** of each fiscal year's funds for applicable programs. **All transferred funds must be used for district improvement activities**. A district identified for corrective action may **not** transfer any funds.

1. Among which programs may I transfer funds?

You may transfer funds **FROM** each of these programs:

(1) Title II-A Teacher Quality **(MUNIS Revenue object 5231)**
(2) Title II-D Education Technology **(MUNIS Revenue object 5234)**
(3) Title IV-A Safe and Drug-Free Schools **(MUNIS Revenue Object 5232)**
(4) Title V-A Innovative Programs **(MUNIS Revenue Object 5233)**

TO any of these programs:

(1) Title I-A Basic **(MUNIS Revenue Object 5241)**
(2) Title II-A Teacher Quality **(MUNIS Revenue Object 5242)**
(3) Title II-D Education Technology **(MUNIS Revenue Object 5245)**
(4) Title IV-A Safe and Drug-Free Schools and Communities **(MUNIS Object 5243)**
(5) Title V-A Innovative Programs **(MUNIS Revenue Object 5244)**

Note: Districts may transfer funds <u>into</u> Title I but may not transfer funds <u>from</u> Title I.

2. If I transfer funds, what program requirements will apply?

Transferred funds are subject to the rules and requirements applicable to the program to which they are transferred. Part A of Title I has several statutory set-asides governing a district's use of fund, therefore, a district must apply the Title I set-aside provisions to funds that are transferred to its Title I allocation.

3. When may I transfer funds and how many transfers may I make?

There are no statutory limitations on the number of times a district may transfer funds into, or from, an individual program during a fiscal year. However, each transfer should be made only after the district has engaged in thorough and careful planning.

4. What steps must a district take before transferring funds?

Before transferring funds, a district must –

(1) Conduct consultations in accordance with section 9501 of the ESEA in order to provide for the equitable participation of private school students and staff;
(2) Determine the program(s) from which funds are to be transferred and to which funds will be transferred;
(3) Determine the amount, and Federal fiscal year, of funds to be transferred by fiscal year (subject to the 50 percent or 30 percent limitation);
(4) Establish the effective date for the transfer;
(5) As appropriate, modify each affected local plan or application to reflect the transfer; and
(6) Notify KDE of the transfer at least 30 days before the effective date of the transfer. (If a

district modifies a local plan as a result of a transfer, the district also must submit to KDE, within 30 days after the transfer, a copy of its revised local plan.)

5. My district has been identified for improvement; can I transfer funds?

Yes, However, a district identified for improvement may transfer no more than 30 percent of the funds allocated to it for a given fiscal year under each of the applicable programs. Once a district has been identified for improvement, any subsequent fund transfers must be consistent with the 30 percent limitation, **and all transferred funds must be used for improvement activities.**

6. My district has been identified for corrective action; can I transfer funds?

No, a district identified for corrective action may not transfer funds. Once a district has been identified for corrective action, it may not transfer any funds during the period it is in corrective action status.

7. How will the transfer be handled in MUNIS?

When a district determines a need to transfer funds within the Pool, a Budget Amendment (TYPE 3) will be made. The object code that is chosen for the grant receiving the funds will be from the 5230 series. The object code for the grant transferring the funds will be from the 5240 series.

Example: District has original allocation from Title 1 of $500,000 and from Title II of $200,000. District wishes to transfer $100,000 from Title II – Teacher Quality to Title I:

A budget amendment would be made (**Must be Type 3):**

INCREASE	220	5231 310X	NCLB Transfer from Title II	100,000
DECREASE	220	5241 401X	NCLB Transfer to Title I	100,000

After the transfer the revenue budgets of each grant look like this:

Title I

220	4500	Restricted Federal Revenue	500,000
220	5231	Transfer from Title II	100,000
Total Revenues			600,000

Title II-Teacher Quality

220	4500	Restricted Federal Revenue	200,000
220	5241	Transfer to Title I	100,000
Total Revenues			100,000

8. How does the district get reimbursement for these funds?

The original allocation for each program will not change. If funds are drawn by “federal cash request” you cannot request more than your original allocation for each program. Therefore, you will need to request the funds on the “federal cash request” by the original program. Remember that your original allocations to each of these grants do not change. If the district chooses to make any transfers they should remember that when making cash requests for these grants you must request from the correct grant.

Example: Use the transfer in the previous question.
The district’s original allocation for Title I was $500,000. The district can only request reimbursement from Title I for $500,000. The additional $100,000 that was transferred will be a request to Title II, even though the $ were spent by Title I.

9. What if I have a private school participating in the program I want to transfer?

In accordance with the General Provisions, Section 9501, consultation with private school officials is required if the transferred funds involve private school participation. If the private school does not agree to the transfer, the district must allocate the per pupil amount to the private school based on 100% of the original program allocation.

10. Where do I get the Transfer Amendment form?

The Transfer Amendment form can be downloaded at the following website: http://www.education.ky.gov/KDE/Administrative+Resources/Doing+Business+With+KDE/Fiscal+Year+Grant+Allocations.htm.

The district must notify KDE at least 30 days prior to the transfer. The finance officer originates a Transfer Amendment and forwards it to the superintendent or his/her designee for submission via email to the Kentucky Department of Education. ***Unless there is a problem with the Transfer Amendment, the amendment is approved upon receipt.*** You will be contacted if there is a problem.

To submit a Transfer Amendment via **email** to the Kentucky Department, of Education:

1) Set up a folder in email of the superintendent or designee for "Transfer Amendments" since only the superintendent or designee may submit Transfer Amendments to KDE.
2) Send the email to *Becky Stoddard* at Becky.Stoddard@education.gov or select her name from the Global Exchange.
3) Copy the email to the district program coordinator as well as any other appropriate persons in the district.
4) In the *Subject* line of the email, type "*Transfer Amendment*".
5) In the Message box of the email, attach the Transfer Amendment.
6) Email the Transfer Amendment to the KDE contact (Becky Stoddard). The contact will forward the email amendment to the appropriate program staff at KDE for review.
7) Update the Comprehensive District Improvement Plan and the affected MUNIS program budgets to reflect the changes in the approved amendment. The following quarter's MUNIS expenditure report must reflect the changes.

11. Whom do I call if I have questions?

You may call Becky Stoddard at 502-564-1979.

TITLE I PART A GOVERNANCE

NCLB Title I, Part A

1. Public Laws (statutes) enacted by Congress:
   a) ***No Child Left Behind Ace of 2001 (NCLB – Public Law 107-110 - reauthorized*** the Elementary and Secondary Education Act of 1965 (ESEA) effective January 8, 2001.
   b) ***General Education Provisions Act (GEPA) as amended by IASA of 1994*** contains requirements that apply to most programs administered by the US Department of Education.
   c) ***Single Audit Act of 1984 - Single Audit Act Amendments of 1996*** - requires annual financial audits by an independent auditor for grantees and subgrantees expending more than $300,000 per year in federal financial assistance and that audits be performed in accordance with government auditing standards for financial audits. If an entity does not meet the $300,000 threshold, it may not charge the cost of a Single Audit to a federal award but could charge the cost of limited scope audits. The Single Audit Act Amendments of 1996 apply to audits of fiscal years beginning on or after July 1, 1996.
   d) ***Cash Management Improvement Act (CMIA) of 1990*** - Public Law 104-453 - enacted to improve the transfer of funds between federal agencies and the states through the use of sound management principles.
2. Regulations Enacted By Federal Agencies (published in the Federal Register):
   a) ***Education Department General Administrative Regulations (EDGAR)*** - US Department Of Education regulations that further define public law by identifying requirements implementing general mandates or administrative policies which have the full force and effect of law when based on underlying statutory authority. Title I Regulations in 34 CFR, Part 200 and Parts 76 (except 76.650-76.662), 77, 80, 81, 82 and 85 are applicable to the Title I program.
   b) ***Treasury Department Regulations*** - US Department of Treasury regulations that identify standards to follow for controlling and accounting for federal funds and further define the Cash Management Improvement Act of 1990. Require federal agencies to monitor the cash management practices and techniques of its recipients and requires recipients (State Education Agency - SEA) to monitor the funds held by secondary recipients (Local Education Agency - LEA).
3. Government-wide Administrative requirements developed and issued by one of the central management agencies such as the Office of Management and Budget (OMB) and the Department of Treasury that apply to all federal departments/agencies. Designed to bring a degree of uniformity and consistency to federal grants management. These requirements do not carry the full force of the law by themselves, but federal agencies can make them applicable by incorporating them into their regulations or grant conditions.
   a) ***Accounting Principles and Standards for Federal Agencies*** - General Accounting Office (GAO) headed by the Comptroller General of the U.S. - imposes various accounting requirements on federal agencies (i.e. US Department of Education and grants administered by those agencies.

b) ***Office of Management and Budget (OMB) Circulars/Cost Principles and Treasury Department Government-wide Circulars*** - refine GAO's accounting requirements and set forth several cost and other administrative requirements for grantees and subgrantees. Many federal agencies adopt these requirements by incorporating them into their own regulations.

c) The US Department of Education has incorporated the following OMB Circulars into EDGAR that are applicable to Title I:

- ***OMB Circular A-102 Revised*** - "Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments"
- ***OMB Circular A-87*** - "Cost Principles for State, Local and Indian Tribal Governments"
- ***Revised OMB Circular A-133*** - "Audits of States, Local Governments and Non-Profit Organizations"

FISCAL REQUIREMENTS

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Title I Fiscal Issues* that may be found at **www.ed.gov/programs/titleiparta/fiscalguid.pdf** To ensure that Title I Part A funds are used to provide services that are in addition to the regular services normally provided by a district for participating children, three fiscal requirements related to the expenditure of regular state and local funds must be met:

1. **Maintenance of Effort –** Either the combined fiscal effort per student or the aggregate expenditures of the district from state and local funds for free public education for the preceding fiscal year cannot be less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. The underlying principle is that the district is responsible for maintaining effort from year to year in providing a free public education to its students; only then can Title I be added.

2. **Comparability –** State and local funds must be used to provide services in Title I schools that are at least comparable to the services provided in schools that are not receiving Title I funds. A district is considered to have met the comparability requirement if the district files with the SEA a written assurance that it has established and implemented a district wide salary schedule; a policy to ensure equivalence among schools in teachers, administrators, and other staff; and a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. The Comparability Report must be completed annually. The Comparability Report, Worksheets and backup data must be kept on file in the district Title I office.

3. **Supplement, Not Supplant –** A district may use Title I funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of children participating in Title I programs. **In other words, Title I cannot take the place of state and local resources.**

   The two types of Title I programs are schoolwide programs and targeted assistance schools.

   - **Schoolwide Program School** - A schoolwide program school must use Title I funds only to supplement the amount of funds that would, in the absence of the Title I funds, be made available from non-Federal sources for that school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.

     Unlike a targeted assistance program, a schoolwide program school is not required to select and provide supplemental services to specific children identified as in need of services. *[Section 1114(a)(2)]*

     Schoolwide programs (SWP) are designed to upgrade the effectiveness of the entire school program with the express purpose of helping all students to achieve, particularly the lowest performing students. In schoolwide programs, which may be conducted only in schools with very high poverty (40 percent or more), Title I funds are used with all other school resources and serve everyone in the school. Therefore, the fiscal test for determining whether Title I funds are supplemental in schoolwide programs is distinctly different than for targeted assistance schools. Because Title I services – the entire school program – are provided to all students in a schoolwide program, the supplement, not supplant test is **strictly a funds test:** Title I funds (and other federal education program funds included in the SWP) must supplement the total amount of funds that would, in the absence of the federal funds, be made available from nonfederal sources

for the school, including funds needed to provide services required by law for children with disabilities and children with limited English proficiency.

- **Targeted Assistance School** – A district may use Title I funds only to supplement the level of funds that would, in the absence of Title I funds, be made available from non-Federal sources for the education of students participating in Title I programs. In no case may Title I funds be used to supplant--i.e., take the place of--funds from non-Federal sources. To meet this requirement, a district is not required to provide Title I services using a particular instructional method or in a particular instructional setting. *[Section 1120A(b)]*

  In contrast to schoolwide programs, targeted assistance schools "target" additional services to only those students identified for Title I participation. For targeted assistance schools, the supplement, not supplant test is not only a funds test, but also a test of services. Participating students must be provided the same services with local and state funds that they would have been provided in the absence of Title I.

  In operating a targeted assistance program, Title I, Part A of the ESEA gives district and school officials flexibility in selecting the instructional strategies that they believe will best meet the needs of students who are at risk of not meeting challenging State academic achievement standards. The expectation is that districts and schools will use sound instructional strategies of high quality to ensure that the students served will reach proficiency on challenging State academic standards and assessments. At the same time, the type of programs supported by Title I must supplement the educational services that a district would, in the absence of Title I, provide to its students. Programs that do not remove children from the regular classroom during regular school hours for Title I services and, instead, provide extended learning time (e.g., extended school year, before- and after-school, and summer programs etc.) are per se supplemental. Districts and schools are encouraged to be creative in the way they provide services to Title I children while remembering that the educational services provided with Title I funds must be in addition to those services that the district and school provides to all of its children using State and local funding sources.

- **Presumption of Supplanting**

  To determine compliance with the supplement not supplant requirement, a State must determine what services a district would have provided in the absence of Title I funds to students in Title I schools. Keep in mind that any determination about supplanting is very case specific and it is difficult to provide general guidelines without examining the details of a situation. Because Title I funds are available, the State would use a set of presumptions—that is, predictions—of what the district would have provided in the absence of the Title I funds based on its behavior in other situations.

  For example, in the following instances, it is presumed that supplanting has occurred:

  a. A district used Title I funds to provide services that the district was required to make available under Federal, State, or local law.

     EXAMPLE:

     The Individuals with Disabilities Education Act (IDEA) requires that a district serving children with disabilities develop an individualized education program (IEP) to ensure that a child with a disability receives a free appropriate public education. The IEP functions as a framework for the services the district is required to provide to each child to meet the requirements of IDEA. A district may not use Title I funds to provide services that must be provided under each child's IEP because, in the

absence of the Title I funds, it is presumed that the district would use other funds or it would be in violation of the IDEA. However, in a targeted assistance school, a district may use its Title I funds to provide additional, supplemental services to such children. In a schoolwide school, a district must ensure the Title I funds a school receives supplement the amount of funds that would, in the absence of the Title I funds, be made available from non-Federal sources for that school, including the amount of funds needed to provide services that are required by law for children with disabilities.

b. A district used Title I funds to provide services that the district provided with non-Federal funds in the prior year(s).

EXAMPLE:

A district paid for a reading specialist in a Title I school in the previous year from State and local resources but decides to use Title I funds to pay for that teaching position in the current year. This would be supplanting because the district is replacing State and local resources with Title I resources to pay for the same teaching position.

c. A district used Title I funds to provide services for children participating in a Title I program that the district provided with non-Federal funds to children not participating in Title I.

EXAMPLE:

A State requires only half-day kindergarten. A district may not use Title I funds to pay for an extended-day kindergarten program for Title I schools and then use State or local funds to pay for a full-day kindergarten program in non-Title I schools. This would be supplanting because Title I schools would not be receiving any of the State or local funds. In other words, a district may not use Title I funds to pay for services in Title I schools and use State funds to pay for the same services in non-Title I schools.

- **NOTE (REBUTTABLE)**

These presumptions, however, are rebuttable if the district can demonstrate that it would not have provided the services in question with non-Federal funds had the Federal Title I funds not been available. For example, in the second situation discussed above, a district could provide programmatic and fiscal documents showing that the teaching position paid for in the previous year with State and local funds was eliminated in the current year because of State and local budget cuts. The district would need to ensure that it had contemporaneous records to confirm:

- ✓ There was in fact a reduced amount or lack of State and local funds available to pay for this position.
- ✓ The district made the decision to eliminate the position without taking into consideration the availability of Federal funding, along with the reasons for that decision—e.g., school board minutes.

AVAILABILITY OF TITLE I. PART A FUNDS

NCLB Title I, Part A, Section 1127

Grant Period

Before a State Education Agency (SEA) may receive Title I Part A funds, it must submit a State Plan to the U.S. Department of Education for approval. Title I Part A funds become available for obligation by the SEA on July 1 for the federal fiscal year beginning October 1 and ending September 30.

A SEA may not authorize a Local Education Agency (LEA) to obligate funds until the later of the following: the date the SEA may begin to obligate funds; or July 1. **No funds may be obligated prior to July 1.**

Funds are intended to be expended during the year for which they were appropriated. However, in accordance with the Tydings Amendment of the General Education Provisions Act (GEPA), unexpended funds may be carried over an additional year except where restricted by specific statute.

15% Carryover Limitation

Under section 421(b) of the General Education Provisions Act (GEPA), districts must obligate funds during the 27 months extending from July 1 of the fiscal year for which the funds were appropriated through September 30 of the second succeeding fiscal year. This maximum period includes a 15-month period of initial availability plus a 12-month period for carryover. However, section 1127(a) of Title I of the ESEA limits the amount of Title I, Part A funds a district may carry over from one fiscal year's allocation to not more than 15 percent of the total Title I, Part A funds allocated to the district for that fiscal year. For districts with Title I basic allocations of $50,000 or more, the Title I law limits the carryover as of September 30 (15 months) to not more than 15% of the district's Title I Basic allocation.

The following illustrates how the 27-month availability for Title I, Part A funds and the carryover limitation would operate for a district that receives an allocation under the FY 2005-06 appropriation.

Federal FY 2006 Appropriation
(Title I, Part A Funds Allocated to the LEA from Funds Made Available on July 1, 2005
Total $1,500,000)

Total allocation	$1,500,000
Minimum amount district must obligate between July 1, 2005 – September 30, 2006 to avoid excess carryover (85 percent of total appropriation)	1,275,000
Amount district may carryover and obligate during October 1, 2006 – September 30, 2007 (carryover period provided under section 421(b) of GEPA)	225,000

During the first 15 months that a district's Title I, Part A funds are available, the district must, by September 30, 2006, obligate at least $1,275,000 (85 percent) of the total allocated to it. The district may carry over a maximum of $225,000 (15 percent) into the next fiscal year and must obligate those funds by September 30, 2007.

A State may, **once every three years**, waive the percentage limitation upon written request of a district if it determines that the request is reasonable and necessary or if supplemental appropriations become available.

Carryover Funds

Carryover funds are to be used in accordance with the federal statutes and regulations that are in effect for the carryover period. A district may **not** use carryover funds to provide services in an ineligible school. When allocating funds to school attendance areas, a district may:

1. Distribute carryover funds to participating schools in accordance with allocation procedures that ensure equitable participation of private school children.
2. Allocate to schools with the highest concentrations of poverty in the district, thus providing a higher per-pupil amount to those schools, ensuring equitable participation of private school children.
3. Provide additional funds to any of the activities supported by district set-asides. Example: parental involvement activities; note that if a district adds carryover funds to a reservation to which equitable services apply (e.g., parental involvement), the district must also calculate and provide equitable services from the carryover funds.

Expending Old Year Funds Prior to New Year Funds

While old year funds may be carried over, districts are reminded that old year funds should be expended prior to new-year funds. Old year funds have an earlier lapse date and good business management practices dictate that old year account be closed out rather than maintaining accounting records on two separate grants concurrently. Expending old year grant funds first will ensure the district is within the 15% limitation on September 30 carryover funds. A final expenditure report for the old year grant is to be filed before requesting a **second** draw on new-year funds.

Reallocation of Excess Funds

A SEA reallocates excess Federal program funds due to any one or a combination of the following:

1. An eligible district chooses not to participate in the Title I program;
2. A district has carryover funds in excess of the 15% allowed in Section 1127 of the law and a waiver cannot be granted;
3. An district's allocation has been reduced because it failed to meet the maintenance of effort requirements in Section 14501 of the statute;
4. The SEA has determined that a district has failed to spend funds in accordance with applicable laws and has recovered funds.

The SEA will reallocate excess funds to eligible districts providing evidence of the greatest need in accordance with established reallocation procedures. All districts will be notified in writing of the opportunity to apply for reallocation funds and provided the criteria for qualifying. Reallocation of excess funds will not extend the grant period for which the funds are available for obligation.

WHEN OBLIGATIONS ARE MADE

EDGAR 76.704-76.707

Effective Date Districts May Begin to Obligate Title I Funds

Title I grant funds cannot be obligated (see chart below) prior to the effective date of the grant identified in the Title I Plan approval letter or the effective date of an amendment. An effective date cannot be before the July 1 availability date of federal funds.

Obligation and Liquidation of Unpaid Obligations

For districts with Title I basic allocations of $50,000 or more, the Title I law requires that funds be obligated by September 30 to comply with the 15% limitation for carryover funds. Obligations of carryover funds must be made **prior** to the lapse date of the grant.

Liquidation of unpaid obligations must occur within 90 days after the lapse date. Obligations are liquidated when a check has been issued for the obligated amount. **No deviations are allowed in obligations in effect at the end of a grant period.** For this reason, it is recommended that districts ensure funds are obligated **and** liquidated prior to the lapse date. Otherwise, any changes due to credits or backordered items will result in remaining funds having to be returned to the federal government. No new purchase orders or substitutions can occur.

When Obligations Are Made

An obligation is an actual cost owed due to purchase orders issued, contracts signed, or services rendered for which a district is **required** to make payment. It is not an anticipated or estimated cost. The following table shows when a district is considered to have an obligation for various kinds of property and services for which Title Funds will be disbursed:

If the obligation is for:	The obligation is made:
Acquisition of personal property	On the date the district makes a binding written commitment to acquire the property.
Personal services by an employee of the district	When the services are performed.
Personal services by a contractor who is not an employee of the district	On the date the district makes a binding written commitment to obtain the services.
Performance of work other than personal services	On the date the district makes a binding written commitment to obtain the work.
Public utility services	When the district receives the services.
Travel	When the travel is taken.
Rental of real or personal property	When the district uses the property.

MUNIS QUARTERLY EXPENDITURE REPORT

1. The MUNIS Quarterly Expenditure Report provides data for all financial reporting requirements on a single report in printed form and in a spreadsheet import file format. The finance officer in each district received directions from the Division of School Finance on generating a MUNIS Quarterly Expenditure Report.
2. The directions received by the finance officer also contain information on updating the projects for the new grant year. Funds from different grant years may not be commingled.
3. The expenditure report is submitted for the quarter ending the previous month: July 1 - September 30 report period due October 25; October 1 - December 31 report period due January 25; January 1 - March 31 report period due April 25; and the April 1 - June 30 report period due July 25.
4. The information will be entered as individual object codes and then unit codes. The object codes will be totaled for those programs that don't need a breakdown by unit codes (schools).
5. The expenditure report may show changes in object codes and transfers of monies among object codes and code series as long as the object code series are open.
6. Expenditures in specific object codes must be allowable according to program guidelines. Use the Comprehensive District Improvement Plan Funding Matrix to verify allowable expenditures. Each district program coordinator must review the report prior to submission to ensure expenditures in specific object codes are allowable according to program guidelines.
7. The Division of Budgets in the KY Department of Education will review the expenditure reports to make sure that expenditures in specific object codes are allowable according to Title I guidelines.
8. The expenditure report will also be used to monitor district cash drawdowns on the Federal Cash Request form to ensure compliance with federal regulations limiting cash on hand and to monitor program expenditures in a timely fashion.

FEDERAL CASH REQUEST

Federal Cash Request forms for advanced funding are to be submitted by the 15th of each month to Sherry Brumback in the Division of Financial Management. Request only enough cash for the next 30 days disbursements. If cash requested plus previous cash received minus expenditures equals more than 1/9th of the grant, note on the form the reason the extra cash is needed.

INTEREST EARNED

Interest earned over $100 per year on US Department of Education federal grants must be returned to the federal government [(EDGAR) 34 CFR 80.21(i)]. Also, federal cash advances should be timed to meet immediate cash disbursements to eliminate cash balances on hand that would earn interest. Districts consolidating bank accounts into one account with MUNIS tracking the expenditures by grant funds must distinguish between interest earned by US Department of Education grant funds and interest earned on other federal, state or local sources. Most commercial banks have the capacity to set up a system that separately tracks interest earned from funds deposited in the district's account from different sources.

TITLE I, PART A BUDGET CALCULATIONS

1. Use whole dollar amounts.
2. **Salary Related Entries:** (Check with the finance officer for the latest rates.)
   a. Salaries are based on the board's adopted salary schedule.
   b. Current employer's matching contributions:
   - Social Security – applies only to KERS and CERS employees
     Salaries minus 5% Tax Deferred County Retirement x rate
   - Medicare – applies to teachers hired after July 1, 1986
     Salaries x rate
   - Kentucky Teachers Retirement System (KTRS)
     Salaries x rate
   - County Employees Retirement System (CERS)
     Salaries x rate
   - Kentucky Employees Retirement System (KERS)
     Salaries x rate
   - Workers' Compensation (rate per $100) – Workers' Comp through Ky. School Bd. Association Insurance Trust may vary for each LEA depending on their Class, Tier and Experience Mod Factor
     Salaries x rate
   - Unemployment Insurance (1% of lst $6,000* if full-time Title I; prorate if salary is prorated.)
     *If an employee makes less than $6,000, use the lower figure
     Example:

10 employees @ $40,000: $6,000 x 10 x .01 =	$600
3 employees @ $40,000: $6,000 x 50% x 3 x .01 =	$90
1 employee @ $5,000: $5,000 x .01 =	$50
Total	$740

3. **Indirect Costs (EDGAR 76.560-76.569):** Funds to defray indirect costs incurred by the board of education in the implementation of the Title I program may be paid by the Title I account to the General Fund.

   On an annual basis, the Division of School Finance, Office of District Support Services, Kentucky Department of Education, assists districts in determining the indirect cost rates to be used in calculating the allowable amount of indirect costs claimed. Because of the supplement-not-supplant requirement of the Title I statute, the **restricted** indirect cost rate shall be used in claiming indirect costs against the Title I grant.

   If a district claims indirect costs, only items that are specified in the indirect cost rate agreement (such as the Title I Coordinator's salary) may be charged to Title I. Indirect costs cannot be claimed on capital equipment purchases ($5,000 or more per unit).

   Indirect Costs Formula: Total Grant Amount - Capital Outlay Costs (Equipment $5000 or more per unit) ÷ the sum of (the LEA's Restricted Indirect Cost Rate in decimal form plus 1.0) x LEA's Restricted Indirect Cost Rate = Total Indirect Costs Allowed (*Rounded*)

   Example: $251,405 Total Grant Amount - $10,500 Equipment Costs = $240,905
   $240,905 ÷ 1.0220 (Sum of .0220 plus 1.0) = $ 235,719.18
   $235,719.18 x 2.20% LEA's Restricted Indirect Cost Rate = $5,186 Total Indirect Costs Allowed (rounded)

4. **Equipment**: Items having a useful life of more than one year and costing $5,000 or more per unit are considered equipment and must have prior approval to purchase (EDGAR 80.30(b) and OMB Circular A-87). Equipment must be reasonable and necessary to meet

the needs of Title I students. In targeted assistance schools Title I equipment may only be used by Title I students. Computers purchased with Title I funds may only be used to supplement the state required technology efforts. For equipment $5,000 or more per unit, include an Equipment Exhibit in the text box of the amendment with the following: Equipment Item, Unit Cost, Number of Items, Total Cost, Location (name of school or office) and Justification for the Purchase. For accounting purposes use MUNIS object codes 0731-0736 for equipment regardless of cost. Use MUNIS object codes 0640/0645 for audio-visuals and 0640/0648 for computer software.

5. **Parent Involvement**: Districts with district allocations greater than $500,000 are required to set-aside at least 1% of their allocation for parent involvement activities. At least 95% of the parent involvement set-aside must be distributed to the Title I schools to use for parent involvement. Districts on MUNIS can distinguish the various expenditure object codes used for these activities when keying budgets into the KETS DAS system by using the Parent Involvement ORG code number key 150. While the MUNIS Quarterly Expenditure Report will only reflect object codes, districts will have the capacity to document locally their expenditure of the 1% required. This information will be reviewed locally during monitoring visits and/or audits. Note: If a district only expends parent involvement funds for parent meetings/newsletters only, the object code 0892 would suffice.

6. **30% Sick Pay Retirement:** If the district has a written board policy whereby certified staff may receive 30% of their salary based on the unused sick days which is added to their last pay check, Title I may be charged for that salary **pro-rated to those days worked in the Title I program**. Payroll records are required to be on file in the local board office in support of the expenditure. This expenditure would be under object code 0291.

Estimated 30% Sick Pay Retirement

Teacher	Total Years District Service	Total Years of Title I Service	% Title I Service
Joe Jones	30	3	3 divided by 30 = 10%

Daily Rate of Pay:	$142
Number of Days Accumulated:	40
$142 x 40 sick days =	$ 5,680
30% of $5,680 =	$1,704
Portion of Benefit Paid by District = .90 x1,704 =	$1,534
Portion of Benefit Paid by Title I = .10 x $1,704 =	**$170**

7. **Excess Costs of Operation and Maintenance of Plant:** Funds to defray excess costs of operating and maintaining Title I classrooms or other space required in conducting a Title I program may be paid by the Title I account to the General Fund. Space that has prorated use may **not** be charged to Title I. Excess costs of Operation and Maintenance of Plant may **not** be claimed for schoolwide programs. Funds must be budgeted on the initial MUNIS Quarterly Expenditure Report for this purpose and supported by the proper documentation on file locally. The Excess Costs Worksheet (see attached) presents calculation procedures for determining the **maximum** amount of Title I funds which may be budgeted for Excess Costs of Operation and Maintenance of Plant (Munis Code 0899). This worksheet and supporting documentation are maintained locally and will be reviewed during monitoring visits and/or audits. If excess costs of Operation and Maintenance of Plant are claimed, project funds for these costs may be paid to the local board of education only as follows:
   - **Alternative A:** The total amount of excess costs of Operation and Maintenance of Plant approved for the project year may be paid to the board at the end of the school year. This expenditure will be made to the board and reported on the June 30 Expenditure Report.
   - **Alternative B:** One-half of the year's approved excess costs of Operation and Maintenance of Plant may be paid to the board at the end of the first semester with the balance paid at the end of the school year. The district will report one-half expenditures on the Expenditure Report for the period ending December 31 and the balance on the report for the period ending June 30.

CALCULATIONS

Worksheet
Excess Costs of Operation and Maintenance of Plant

The following is an example of a worksheet showing excess costs for operation and maintenance of plant. If a district charges Title I for excess costs for operation and maintenance of plant, the worksheet and backup documentation must be on file in the district Title I office for review.

Note: **MUNIS** combines Operation and Maintenance of Plant under Function Code 2600.
Note: Operation and Maintenance costs may **not** be claimed for a schoolwide program.

1. Total district costs of Operation and Maintenance of Plant during the 2001-02 school year (MUNIS Function Code 2600): $259,550
2. Number of classrooms and classroom equivalents used at each school during the 2001-02 school year:

School	Classroom	Cafeterias*	Gyms**	Offices	Library	Other	Total
Board Office	0	0	0	6	0	0	6
Washington	18	1	1	3	1	2	31
Jefferson	20	1	1	3	1	1	32
Lincoln	22	1	1	3	1	2	35
Kennedy	34	1	1	4	1	3	49
Regan	36	1	1	4	1	3	51
Clinton	48	1	1	6	1	5	67
Totals	178	6x2=12*	6x5=30**	29	6	16	271

*Each cafeteria figured as two classroom equivalents.

**Each gym figured as five classroom equivalents.

3. Average cost for each classroom, or its equivalent, based on Parts 1 and 2 above:
   $259,550 ÷ 271 classrooms = $957.75 ÷ 12 months = $79.81
4. Number of Title I classrooms and/or offices for which operation of plant and maintenance expenses represent excess costs (see Part 6 criteria of this project):
   1 public secondary classroom; 5 public elementary classrooms;.5 private Title I reading room**
   6 public + 0 private = 6 total
   **No fraction of a classroom is to be counted due to Item A. in Part 6 below.
5. Calculated Excess Costs for Operation of Plant for the 2001-02 school year:
   6 classroom x $79.81 per classroom per month x 9.25 months = $4,429
6. The following statements must be included as Part 6 of the worksheet: The number of classrooms/offices entered in Part 4 above includes only those spaces used throughout the project period and to which the following conditions apply:
   A. The same space would not incur operation and maintenance costs in the absence of Title I programs;
   B. The use of Title I classrooms/offices actually increases the district's operation and maintenance of plant costs; and
   C. The actual operation and maintenance of the Title I space is not substantially less than the other spaces of the same size included in the display in Part 2 above.

PROCUREMENT, INVENTORY, AND DISPOSITION OF EQUIPMENT PURCHASED WITH TITLE I, PART A FUNDS

EDGAR Sections 80.20 and 80.32

Procurement of Title I, Part A Property and Services

A district must account for grant funds in accordance with State laws and procedures for expending and accounting for its own funds. When procuring property and services under Title I, Part A, the district must follow the same policies and procedures it uses for procurement from its non-Federal funds. Districts must follow the *KDE Property Procedures*.

Title I, Part A Inventory

Definition of Asset: The Kentucky Department of Education defines an asset as real property costing $1,000 or more, including all workstations and has a useful life of more than 1 year and theft sensitive items that may be identified by the Board of Education. This property is governed by audit requirements associated with control, accounting, and disposal. Only items defined as assets are recorded on the master inventory listing. The Title I Coordinator works collaboratively with the Finance Officer regarding the inventory of Title I, Part A assets.

Inventory: KDE recommends that districts fully utilize the MUNIS Fixed Asset Module that interfaces with the MUNIS Purchasing and Accounts Payable Modules to automatically flag potential new assets. The district uses the MUNIS Fixed Asset Module to generate a master inventory listing of Title I equipment in all public and private schools and central office. The assets can be individually tagged using district bar code labels and then recorded in MUNIS by tag number. Each asset record includes cost, location, custodian (recommended field for Title I identification), and other pertinent information related to the Purchase Order and invoice payment of the asset. KDE recommends that a barcode reader be used to take the annual inventory. The time between the inventory and the updating of the MUNIS Fixed Asset System should be minimal. The barcode reader reconciles the assets scanned to the MUNIS Asset Master file and identifies assets that are on site and those that are not by location. This information is fed back into the MUNIS Fixed Asset System. Assets that have been moved from location to location and missing assets are updated within MUNIS.

Inventories will be accomplished annually on all assets by appropriate personnel. Results of these inventories will be reconciled, coordinated and reported as required by the Finance Office to the Superintendent and School Board. Each responsible individual, i.e. school principals and department managers, will have 30 days to complete their inventory validation. Each location will receive 2 copies of their master inventory. Upon completion of the validation the responsible individual will annotate changes, sign, date and return one copy of their inventory to the Asset Coordinator. No adjustments to asset records will be accomplished without supporting documentation. Each responsible individual may conduct their actual reconciliation, as they deem appropriate with their personnel. Any questions and/or assistance required should be directed to Administrative Services.

Additional Information: Assets purchased may be insured, but insurance is not required. The insurance premium for Title I assets may be paid with Title I funds if funds were budgeted for this expense. Items stolen may be removed from the inventory list after a police report has been filed. Items can be repaired or maintained with Title I funds if the assets were purchased with Title I funds and money was budgeted for equipment/materials repair.

Disposition of Title I, Part A Purchased Equipment

If no longer useful for Title I, Part A programs, EDGAR specifies disposal procedures to be followed. The following process outlines what happens to equipment purchased with Title I, Part A funds when it is no longer needed for Part A activities. This would include when a school is no longer served by Title I, Part A.

1. For items purchased with Title I, Part A funds that now have a fair market value under $5,000 per unit, it is **no** longer necessary to send a letter to the state Title consultant requesting to dispose of the equipment.
2. Offer the equipment first to other Title I programs, then to Special Education and other federal programs and finally to the regular program.
3. If the equipment is not usable, throw it away.
4. If it is given to other programs or is thrown away, remove the equipment from the inventory and document what was done with it. Keep the documentation in the district Title I office.
5. If the equipment is sold, funds obtained in the disposal of the equipment must be used in the Title I program (separate account from the allocation).

Disposal of Equipment Purchased with Capital Expense Funds

Vans, mobile classrooms and re-locatables are all considered equipment and not real property. Equipment of this nature that has been purchased with Title I Capital Expense funds may continue to be used to serve eligible private school students. The cost of maintaining and operating this equipment is to be paid out of Capital Expense funds. If Capital Expense funds are no longer available, these expenses must be paid off the top out of the districts administrative funds.

If it is determined, after meaningful consultation with the private schools, that the equipment is no longer needed to serve eligible private school students, the procedure for removing the equipment from the inventory depends upon the per unit fair market value of the equipment. Fair market value is to be determined in writing by anyone qualified and knowledgeable in the area.

If the per unit fair market value of the equipment is less than $5,000, the district may either retain, sell or otherwise dispose of the equipment without any further obligation to the Title I program or the federal government. It can be used to serve public school students in either another federal, state or local program.

If the per unit fair market value of the equipment is more than $5,000, the district must open the sale of the equipment for sealed public bid. The district must indicate in the announcement of the sale as to whether or not they will be participating in the bidding. The sale of the equipment would go to the highest bidder. After the sale, the district would write a letter to the SEA describing the sale and the removal of the equipment from the inventory. Since the equipment was purchased with Capital Expense funds, the proceeds would be put into a separate account and could only be used for other Capital Expense activities in the district or SEA. If these funds cannot be used by either the district or SEA, they must be returned to the federal government.

TIME AND EFFORT RECORD/LOG

OMB Circular A-87

1. If district personnel are partially funded with Title I funds, a record/log is required. The record should specify the amount of time working directly with the Title I program. A sample record/log is attached.
2. The time and effort record should be signed by the person's supervisor or by the superintendent.
3. If school personnel in a targeted assistance school are partially funded with Title I funds, a schedule (or a log) is required. The schedule should specify the amount of time working directly with the Title I program and should include "non-instructional" duties. A schedule or log is **not** required for school personnel in a schoolwide program who are partially funded with Title I funds.
4. There should also be some type of certification or documentation for the payroll clerk verifying which programs personnel are paid from. This is for personnel paid completely out of Title I and for personnel paid partially out of Title I. This applies to personnel at the district and school level.

TIME AND EFFORT RECORD									
Employee Name:					Month:				
Reporting Period	**GRANT**	**GRANT**	**GRANT**	**GRANT**	**Reporting Period**	**GRANT**	**GRANT**	**GRANT**	**GRANT**
Day of Month					**Day of Month**				
1					**16**				
2					**17**				
3					**18**				
4					**19**				
5					**20**				
6					**21**				
7					**22**				
8					**23**				
9					**24**				
10					**25**				
11					**26**				
12					**27**				
13					**28**				
14					**29**				
15					**30**				
					31				
TOTALS 1-15					**TOTALS 16-31**				
This is to certify that the undersigned has completed work during the time period for the federal programs as indicated above.									
Employee Signature:					Supervisor Signature:				

STEVENS AMENDMENT

SPECIAL CONDITIONS FOR DISCLOSING FEDERAL FUNDING IN PUBLIC ANNOUNCEMENTS

The recipient agrees that, when issuing statements, press releases, requests for proposals, bid solicitations, announcements of contract awards under the grant, and other documents or announcements describing this project, the recipient shall state clearly:

1. The dollar amount of Federal funds for the project;
2. The percentage of the total cost of the project that will be financed with Federal funds;
3. The percentage and dollar amount of the total cost of the project that will be financed by non-governmental sources.

In addition, when announcing any contract award for goods or services with an aggregate value of $500,00 or more, the recipient agrees to specify the amount of Federal funds used to finance the contract and the percentage of total costs of such a contract that the Federal funds represent.

Title I, Part A, C.F.D.A.#84.010

Note: According to EDGAR (Education Department General Administrative Regulations) The word “project” as used in the Stevens Amendment means the activity described in the application, or any subject subpart thereof. The Stevens Amendment information is identifying that the activities described in the report, brochure, workshop notice, etc., are funded with Title I federal funds, not that the cost of the newspaper advertisement or printing cost of the brochure are being paid for with Title I funds.

For example: Have you ever attended a play or musical production where the program identifies that the performance is being sponsored by a grant from the National Endowment for the Arts and a local business? Remember those road improvement signs at road construction sites that identify that the road improvement is being paid for with your taxes? The brochure/sign isn’t saying the cost of printing the brochure/sign is paid for with the grant/taxes although it may have been; it is saying the ‘performance’ or ‘road improvement’ is being paid for with the grant/taxes.

Sample

Federal funds from the Title I, Part A, C.F.D.A. #84.010 are financing 100% of the costs of this workshop from an approximate project amount of $117,000.