# TITLE I, PART A HANDBOOK

## For School Year 2016-17

Office of Next Generation of Schools and Districts
Division of Consolidated Plans and Audits
Kentucky Department of Education
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## PURPOSE OF 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 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. **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.
6. **Schoolwide Programs** – provides information on effectively implementing the 10 components of a schoolwide program.
7. **Title I Paraprofessionals Guidance** – provides questions and answers on requirements for and assessment of paraeducators.
8. **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. There is also a Toolkit with sample documentation.
9. **Title IX, Part E Uniform provisions Subpart 1- Private Schools** – assists districts to provide equitable services to eligible private school students, teachers, other educational personnel, and parents.
10. **Title I Fiscal Issues** – provides guidance on comparability, supplement versus supplant, etc.
11. **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, non-regulatory 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, the non-regulatory guidance 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.

## SUMMARY OF HIGHLIGHTS AND CHANGES IN THE TITLE I HANDBOOK

The following are points of attention to note in the Title I Handbook:

1. **TIMELINE** – An overall timeline will assist districts with planning and implementing the Title I requirements. The information provided in this section reflects changes due to Kentucky's approved NCLB waiver.
2. **SCHOOL AND DISTRICT ACCOUNTABILITY** – The information provided in this section reflects changes due to Kentucky's approved NCLB waiver, including the elimination of several school improvement requirements and accountability under *Unbridled Learning*.
3. **COMMUNITY ELIGIBILITY PROVISION** – The CEP option permits eligible schools to provide meal services to all students at no charge while eliminating the need to obtain household eligibility data through separate collection.
4. **SERVICES TO PRIVATE SCHOOL STUDENTS** – Title I services must be provided to eligible private school students if the private school elects to have services.
5. **SCHOOLWIDE PROGRAMS** – Title I regulations require that a school operating a schoolwide program (SWP) annually evaluate the implementation of, and results achieved by, the schoolwide program. Information about evaluation for schoolwide programs has been added from the U.S. Department of Education guidance on SWP. The information provided in this section reflects changes due to Kentucky's approved NCLB waiver
6. **COMPLAINT PROCEDURE** – All districts must adopt a procedure for the receipt and resolution of complaints alleging violations of Title I, Part A in the administration of the program. The complaint procedure must include private schools.
7. **FISCAL REQUIREMENTS** – This section includes information and examples regarding supplement vs. supplant.
8. **PROCUREMENT, INVENTORY, AND DISPOSITION OF EQUIPMENT** – All districts must use the KDE Property Procedures and the MUNIS Fixed Asset Module.
9. **TRACKING TITLE I, PART A SPENDING REQUIREMENTS** – The information provided in this section reflects changes due to Kentucky's approved NCLB waiver. During the NCLB waiver period, only parent involvement is required to be tracked under MUNIS under a separate code (310*M).
10. **PERSONNEL PAID FROM Title I** – Payroll records must document the staff at the district and targeted assistance school level paid completely or partially from Title I funds. Schoolwide programs may have to document time and effort, depending on the situation.
11. **SERVICES FOR HOMELESS CHILDREN IN PARTICIPATING AND NON-PARTCIPATING TITLE I SCHOOLS**- a district must provide comparable services to homeless children attending non-Title I schools that the homeless students would receive in Title I schools. A description for services to homeless children in Title I and non-Title I schools must be included in the Title I application in the Grant Management Application System (GMAP).
12. **DISTRICTS RECEIVING MCKINNEY-VENTO GRANTS** – A district receiving the Stewart B. McKinney-Vento Grant must set-aside Title I, Part A funds. These funds must be reflected in the Title1 application in GMAP.
13. **Highly Qualified Teacher/Highly Qualified Paraeducator**: The following links will provide guidance for transitioning from the ESEA, as amended by the No Child Left Behind Act of 2001 (NCLB) to the ESEA, as amended by the ESSA. This guidance includes actions the U.S. Department of Education (ED) has taken or will take consistent with its authority under section 4(b) of NCLB to the ESSA to support States, LEAs, and schools in this transition. ED has prepared these frequently asked questions (FAQs) to support States and LEAs in understanding expectations during the transition to full implementation of the ESSA.

    http://www2.ed.gov/policy/elsec/leg/essa/faq/essatransitionfaqs050316.pdf

    http://www.ed.gov/essa?src=rn

# TITLE I TIMELINE

| Topic | Timeframe |
|---|---|
| SWP & TAS Planning/Review – schools plan program in consultation with Title I coordinator<br>1. Review of data and improvement plan<br>2. Review of SWP<br>3. Completion of SWP/TAS plans<br>4. Annual Evaluation of Title I program | 1. Throughout school year<br>2. Spring<br>3. Spring-Summer<br>4. Spring of each year to plan for next year |
| Services to Private School Students – consult with officials and provide equitable Title I services to eligible students, their parents, and their teachers<br>1. Determination if school wants to participate<br>2. Consultation with school officials<br>3. Set academic goals for students served<br>4. Services to eligible Title I students<br>5. Evaluation of services and students | 1. Spring<br>2. Spring and throughout year<br>3. First day of school for students<br>4. Begin at the same time services provided to public schools begin<br>5. Spring of each year to plan for next year |
| Parent Involvement – communicate with/involve parents in schoolwide or targeted assistance program<br>1. Annual meeting<br>2. School-home compacts<br>3. Annual parent evaluation<br>4. Review of district parent involvement policy<br>6. Review of school parent involvement policy | 1. Fall<br>2. Fall<br>3. Spring<br>4. Annually in fall or spring (after evaluation)<br>6. Annually in fall or spring (after evaluation) |
| 15% Carryover Limitation – for districts with Title I allocations of $50,000 or more; carryover is limited to 15% or less of the district's allocation. Districts may request waiver from KDE once every 3 years. | The carryover limitation must be met:<br>1. Prior to September 30, 2016 (SY 15-16 funds)<br>2. Prior to September 30, 2016 (SY 16-17 funds) |
| Comparability – determine if Title I schools are receiving comparable share of state/local funds | End of 2nd month of school. (KDE will send forms and directions to complete along with deadlines.) |
| 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. | First day of school. |

# 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/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)

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/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 the term used for 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

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.
- Are an integral part of broad school-wide and district-wide 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.
- See Appendix H for additional information regarding scientifically based research

State Educational Agency (SEA) – means the agency primarily responsible for the State supervision of public elementary schools and secondary schools (i.e., 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

Sections 1112, 1113, 1116, 1118, 1119, 1120, 1120A, 1127

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% 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 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 attend Title I and non-Title I schools, including providing educationally related support services to children in shelters. The services in non-Title I schools 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. The reserved funds must address the educational needs of the homeless students. Services must be provided even in participating Title I schools.

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. **Paraeducators:** Districts must ensure that all paraeducators in a program supported with Title I funds meet one of the following requirements:
   - 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 Assessment or an assessment that meets the required criteria.

9. **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% of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.

10. **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.

11. **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.

12. **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. A school district that is interested in obtaining a waiver of the carryover limitation in section 1127(a) so that it may carry over more than 15% of its Title I, Part A, Subpart 2 allocation must apply to its SEA in accordance with the SEA's regular procedures for granting a waiver of the carryover limitation.

13. **Transferability of Funds:** A district may transfer up to 100% of funds from other Federal programs (Title II, Part A; and Title II, Part D) into Title I, Part A. A district may not transfer Title I, Part A funds into other Federal programs.

14. **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 students. However, this is one provision that is waived with ESEA flexibility. An LEA may operate a schoolwide program in a school with less than 40% poverty, if it is identified as a priority or a focus school, in order to allow the LEA to implement interventions aligned with turnaround principles or an intervention that is based on the needs of the school's students. A schoolwide program:

- Is based on one 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 or a SWP plan to help children meet Kentucky's standards.
- Focuses on results. The flexibility in the use of funds must result in increased achievement by student populations (economically disadvantaged, racial and ethnic groups, students with disabilities and students with limited English proficiency).
- **Note: Kentucky's approved NCLB waiver permits an LEA to operate a schoolwide program in a school with less than 40% poverty. To be eligible to take advantage of this waiver provision, the school must: a) be identified as a priority or focus school and b) must be implementing interventions aligned with turnaround principles or interventions that are based on the needs of the school's students. All schoolwide requirements apply to schools that qualify and are taking advantage of this waiver.**

**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 and SWP 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/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 financially support the 10 components in a schoolwide program, but a school with a schoolwide program must include these components in its program. 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 student 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 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, 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 and what 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.

**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. Regardless of funding, all teachers:

- 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, all paraeducators with instructional duties must:

- 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.
- Be included in professional development activities.
- Be 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.
- Not be pulled to be a substitute teacher in a classroom.

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 creating lessons for whole group instruction or introducing new skills, concepts or academic content to the whole class. 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.

**Annual Evaluation/Review of the SWP:** Title I regulations require that a school operating a schoolwide or targeted assistance program annually evaluate the implementation of, and results achieved by, the program. The evaluation must determine whether the program was effective in increasing the achievement of students in meeting the common core state standards, particularly those students who had been furthest from achieving the standards. The school must revise its plan as necessary based on the results of the evaluation to ensure the continuous improvement of student achievement. The intent of the evaluation is that schools conduct an annual review of the strategies in the schoolwide or targeted assistance program to determine if they are contributing to improvement in student achievement or increases in other activities like parental involvement or high quality professional development that lead to increases in student achievement.

The school must decide whether the review will be conducted internally (by school staff) or externally (by a person or persons outside of the school such as district staff, regional educational laboratory, institution of higher education or any technical assistance provider). The decision should be made collaboratively between schools and their districts. Districts and schools are strongly encouraged to use outside reviewers when possible but at least every couple of years.

The annual evaluation examines whether the schoolwide or targeted assistance program is being effectively implemented and whether the implementation is improving student achievement. The annual review should not only address student achievement but also teacher quality, parental involvement, coordination of funds and other components that directly and indirectly affect achievement. The annual review is designed to reveal areas of strength within the program and areas that need revision in order to better position the school to continue improving and making adequate yearly progress.

**Supplement versus Supplant:** Records must be maintained that document that Title I, Part A funds are used to supplement general funds by ensuring that the state staffing formula has been followed (i.e. the school has the required number of general funded staff/funding without counting staff funded through Title I). No distinctions are made in a schoolwide program between staff paid with Title I funds and staff that are not. The Title I funded staff do not have to be the ones delivering the services. All school staff is expected to direct their efforts toward upgrading the entire educational program and improving the achievement of all students, particularly those who are low achieving.

## 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/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 are 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 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.
6. Provide strategies to increase parent involvement, such as family literacy services.
7. 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. Title 1, Part A teachers must:

- 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. Title I, Part A paraeducators must:

- 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 an 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.
- Not be pulled to be a substitute teacher in a classroom as the students will not receive the supplemental services from the paraeducator.

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;
    - Convene an annual meeting to inform parents of their school's participation in Title I, Part A and to explain the requirement
- 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.

**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 is in addition to the regular instructional program.

# 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.jhtml?src=fp.

The following links will provide guidance for transitioning from the ESEA, as amended by the No Child Left Behind Act of 2001 (NCLB) to the ESEA, as amended by the ESSA. This guidance includes actions the U.S. Department of Education (ED) has taken or will take consistent with its authority under section 4(b) of NCLB to the ESSA to support States, LEAs, and schools in this transition. ED has prepared these frequently asked questions (FAQs) to support States and LEAs in understanding expectations during the transition to full implementation of the ESSA.

http://www2.ed.gov/policy/elsec/leg/essa/faq/essatransitionfaqs050316.pdf

http://www.ed.gov/essa?src=rn

Schoolwide programs allow staff in schools with high concentrations of students from low-income families to redesign their entire educational program to serve all students. The emphasis in schoolwide program schools is on serving all students, improving all structures that support student learning, and combining all resources, as allowed, to achieve a common goal. Schoolwide programs maximize the impact of Title I. The following components must be included in a schoolwide program. **Note: Kentucky's approved NCLB waiver permits an LEA to operate a schoolwide program in a school with less than 40% poverty. To be eligible to take advantage of this waiver provision, the school must: a) be identified as a priority or focus school and b) must be implementing interventions aligned with turnaround principles or interventions that are based on the needs of the school's students. All schoolwide requirements apply to schools that qualify and are taking advantage of this waiver.**

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 common core state 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 common core state 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. 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 common core state standards.
4. Strategies to increase parental involvement, such as family literary services.
5. 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.
6. 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.
7. 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.
8. 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.

## 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 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 (e.g., video tapes, newsletters, open house, and 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 common core state standards 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 provide 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 school may use funds received under Title III, Language Instruction for English Language Learners and Immigrants 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.

## 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.

# SAMPLE REPORT FOR ADDRESSING 8 COMPONENTS OF A SCHOOLWIDE PROGRAM

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 eight required components are being covered. Title I does not have to fund all of the eight 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 common core state standards? 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. 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 identified need? 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?

4. 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?

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

6. 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?

7. Activities to ensure that students meet common core 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?

8. 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?

**Schoolwide Program Planning**
**Completing Planning Charts**

1. Provide the school or school council with any available student data (e.g., Kentucky Interim Performance Report (KIPR), the No Child Left Behind (NCLB) Report, achievement gap data, comprehensive school improvement plan, scholastic review or self-study).
2. Label 5 chart papers (from the charts for SWP planning on page 36).
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? What are the 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.

The following link in Infinite Campus is a resource for Title 1 Data Standards:
http://education.ky.gov/districts/tech/sis/Documents/DataStandardTitleI.pdf

## CHARTS FOR SWP PLANNING

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

## Annual Evaluation/Review of Schoolwide Program

Title I regulations require that a school operating a schoolwide program annually review the implementation of and results achieved by the school's schoolwide program. The evaluation must determine whether the schoolwide program was effective in increasing the achievement of students in meeting the common core state standards, particularly those students who had been furthest from achieving the standards. The evaluation must also examine if the program was implemented effectively and whether implementation improved student achievement. The school must revise its plan as necessary based on the results of the evaluation to ensure the continuous improvement of student achievement.

Deciding who will conduct the annual review is an important decision. Specifically, the school must decide whether the review will be conducted internally (by the school staff) or externally (by a person or persons outside of the school, such as staff from the school district, from a regional educational laboratory, from an institution of higher education, or from any other technical assistance provider). This is a decision that should be made collaboratively between schools and their districts. The availability of resources and staff, outcomes of prior reviews, and the experience of the school with implementing schoolwide programs are all factors that should be taken into account. Districts and schools are strongly encouraged to use outside reviewers whenever possible. If resources do not permit the use of outside reviewers on an annual basis, districts and schools might consider using an outside reviewer every couple of years.

Program evaluations/reviews are usually organized and carried out according to the following steps.

1. Identification of purpose and intended audiences – The annual review of a schoolwide program includes determining the percentage of students who reach proficiency on the State's annual assessments. Additionally, it examines the operation of the school: the implementation of instructional strategies, the participation of stakeholders, the degree of parental involvement, and other elements that support increased student achievement, as detailed in the schoolwide program plan.
   The intended audience for the annual review is all stakeholders, internal and external to the school. These stakeholders are persons with an investment in the school, many of whom were involved from the beginning in the development of the school's mission and goals and in the program planning process. They have an interest in knowing whether or not those goals are being met, and want to know what will be done with the results of the annual review. These stakeholders include (1) those involved in day-to-day program operations, such as teaching, administrative and school support staff; (2) those served by the program, such as students, parents and community members; and (3) those in a position to make recommendations and/or decisions regarding the program, such as members of the school planning team, school administrators, and school district personnel.

2. Identification of issues and development of review questions – Program review begins at the same time that the schoolwide program is being designed. That is,

while the school planning team is developing measurable goals and strategies, it should be considering how the success of those strategies would be determined. Planners should envision what progress toward long-term goals would “look like” at the end of the school year.

Key review points should be related to each goal in the schoolwide plan. Questions can address the following:

- Inputs – For instance, what resources were identified in the schoolwide program and to what degree were they utilized?
- Activities – Did planned events such as professional development, parental involvement activities, schoolwide instructional units, take place as scheduled?
- Short-term impacts – What were the short-term results of implementing a particular strategy in the schoolwide plan? Was training provided for the targeted number of school staff? Did the training affect subsequent instructional decisions?
- Longer-term impacts – An annual schoolwide review can provide incremental information that tracks outcomes over time. For instance, a schoolwide program might begin a dropout prevention program for sixth graders with the goal of a reduced dropout rate when those students are in ninth grade.

Once the target objectives have been clarified, reviewers create specific questions that the review will answer. The answers to some questions will be easily determined (e.g., gains in student scores on State assessments), but some will be more difficult to measure (e.g., a positive change in student attitude). Each potential evaluation question should be screened to ensure that it elicits information that is--

- Relevant to the schoolwide program’s goals and objectives;
- Important to a significant number of stakeholders;
- Of continuing relevance and interest; and
- Attainable, given time, resource, and staff constraints.

3. Identification of data collection instruments – Next, reviewers determine how data that answer each question will be collected. Evaluators will collect both quantitative (empirical and numerical, such as tallies and test scores) and qualitative (survey responses on attitudes, personal interviews, observations, journals), depending on the review question. Examples of data collection instruments include document reviews, tallies, questionnaires, interviews, surveys, observations, assessments, attitude inventories, and focus groups. It is the job of the reviewers to align each question with the appropriate data collection method.

4. Collection of data – When data collection instruments have been identified or created, reviewers are ready to gather information. Every stakeholder who will provide the reviewers with information should have a clear understanding of why the review is being conducted, the types of data being collected, and how the results will be used. Data collectors should consider the needs of subjects (e.g., need for anonymity, need for an interpreter) and should obtain any required clearance or permission that is necessary before soliciting information. Because any bias on the

part of a data collector can compromise the credibility of the findings and overall results, data collectors should be carefully trained, and there should be consistency in instructions and data collection procedures so that results are reliable across survey groups. Information should be gathered from as many members of a sample group as possible to ensure that the results are statistically significant.

5. Analysis and interpretation of results – After the data are collected and checked for accuracy; they should be analyzed and interpreted. The initial analysis may raise new questions and/or uncover findings that were not anticipated, and in this case a second analysis may be appropriate. For example, an analysis of assessment data might reveal that students, in the aggregate, have higher performance in reading/language arts than they do in mathematics. A second level analysis might ask why that is so and consider the possibility that there is a relationship between scores and times of day that reading and mathematics are taught or differences in how they are taught.

   Overall, the information that emerges from the data analysis should clearly describe the progress the school has made in implementing its program and increasing student achievement and indicate areas where revisions or additional work is needed. Data gathered in response to each research question should be addressed separately; it should yield detailed findings that clearly indicate whether or not a key strategy or action in the schoolwide plan was implemented as planned. For example, reviewers might determine that participation in professional development for teachers resulted in more effective use of data to improve student achievement. Or, reviewers might conclude that although the schoolwide program school identified a strategy as important, insufficient time or resources were devoted to accomplishing it.

6. Reporting – The report should be clearly and concisely written and available to all stakeholders. The report typically includes background information, the evaluation questions, a description of evaluation procedures, an explanation of how the data were analyzed, findings, and a conclusion with recommendations.

   The following model was developed by the Iowa Department of Education as a rubric for schools to use to assess the quality of their schoolwide plans. The rubric suggests a “three-star” system that highlights the desired qualities/behaviors observed in effective schoolwide programs.

| RUBRIC TO ASSESS QUALITY OF SWP | | | |
|---|---|---|---|
| **Eight Components of SWP** | **Exceptional** *** | **Acceptable** ** | **Needs Revision** * |
| Comprehensive Needs Assessment | Includes a variety of data gathered from multiple sources.<br><br>Examines student, teacher, school and community strengths and needs. | Includes data gathered from two sources.<br><br>Examines student strengths and needs. | Includes data gathered from less than two sources.<br><br>Examines student deficits. |
| School Reform Strategies | Strategies increase the quality and quantity of instruction, using research-based methods and strategies.<br><br>Research-based reform strategies are directly aligned with the findings of the needs assessment.<br><br>Provides a detailed, enriched and accelerated curriculum for all students.<br><br>Addresses the needs of all children in the school, but particularly those who are low achieving, and meets the needs of students representing all major subgroups participating in the schoolwide program.<br><br>Addresses specific strategies that assist teachers to determine if student needs are met. | Increased the quality and quantity of instruction.<br><br>Reform strategies aligned with the findings of the needs assessment.<br><br>Provides an enriched and accelerated curriculum for select students with plans in place to move toward all students.<br><br>Addresses the needs of all children in the school, but particularly the needs of students of target populations participating in the schoolwide program.<br><br>Briefly addresses how the school will determine if these needs are met. | Increases neither the quality nor quantity of instruction.<br><br>Reform strategies are not directly aligned with the comprehensive needs assessment findings and do not reference research-based models.<br><br>Provides a basic curriculum.<br><br>Addresses the needs of select students and there is no clear plan in place that addresses how the school will determine if identified needs are met.<br><br>Teachers are directed to meet student needs without specific strategies or approaches. |
| | | | |

| RUBRIC TO ASSESS QUALITY OF SWP | | | |
|---|---|---|---|
| **Eight Components of SWP** | **Exceptional** *** | **Acceptable** ** | **Needs Revision** * |
| High-quality and Ongoing Professional Development | All staff is trained to meet individual needs of all students, but particularly the lowest achieving students of any program that is included in the schoolwide program.<br><br>All staff receives ongoing and sustained professional development that is aligned with the goals of the school improvement plan. | Most staff receives training toward meeting the needs of only select groups of students.<br><br>Most staff receives ongoing and sustained professional development that is mostly aligned with the goals of the school improvement plan. | Some staff receives fragmented training unrelated to identified school needs.<br><br>Few staff receives professional development; it addresses their individual training goals and is not necessarily aligned with the goals of the school improvement plan. |
| Strategies to Increase Parental Involvement | Specific strategies to increase parental involvement, based upon results of the needs assessment have been identified and implemented.<br><br>Strong collaboration with community resources is evident.<br><br>Parents are included as decision makers in a broad spectrum of school decisions. | Specific strategies to increase parental involvement have been identified and implemented.<br><br>Some collaboration with community resources is evident.<br><br>Parents are included as decision makers in a limited number of school decisions. | Specific strategies to increase parental involvement have not been identified or implemented.<br><br>No collaboration with community resources is observed.<br><br>Parents have no role in the decision making process of the school. |
| Transition Strategies | Collaboration is evident between the elementary school and preschool programs (i.e. state funded preschool, Head Start).<br><br>Specific strategies for helping students' transition into the elementary setting have been identified and implemented. | Collaboration efforts have begun between the elementary and preschool programs.<br><br>Specific strategies for helping students' transition into the regular elementary school setting are not included in the school improvement plan. | Collaboration and communication seldom occurs between the regular elementary school program and preschool programs.<br><br>Specific strategies for helping students' transition into the regular elementary setting have not been identified or implemented. |

| RUBRIC TO ASSESS QUALITY OF SWP | | | |
|---|---|---|---|
| **Eight Components of SWP** | **Exceptional** *** | **Acceptable** ** | **Needs Revision** * |
| Teacher Participation in Making Assessment Decisions | A team of teachers, administrators and parents participate in the selection, use, and interpretation of school-based assessments.<br><br>Student performance drives modifications and improvements in the selection and use of school-based assessments. | Student performance is considered when modifying the school improvement plan.<br><br>Student performance is considered when modifying the plan; however, it does not always occur. | Assessment decisions are made with little or no input from teaching staff.<br><br>Student performance is not considered when making decisions about assessment. |
| Timely and Additional Assistance to Students Having Difficulty Mastering the Standards | The school has a well-defined process that is currently being implemented to identify students experiencing difficulty mastering the State's standards.<br><br>Timely, effective and additional assistance is provided for students experiencing difficulty mastering the State's standards.<br><br>Thematic, integrated instruction, designed to accommodate the needs of various learning styles is provided. | The school has a process in place to identify students experiencing difficulty mastering the State's standards.<br><br>Effective, additional assistance is provided for students experiencing difficulty meeting State standards.<br><br>Students receive some differentiated instruction while working with support staff. | No process is in place to identify students who are experiencing difficult mastering the State's standards.<br><br>Additional assistance is provided to some students who are experiencing difficulty, but the intervention is not regular and ongoing.<br><br>All students are taught using the same methods. |
| Coordination and Integration of Federal, State and Local Programs and Resources | The school has established its improvement plan based on need, and is knowledgeable about and uses all resources available to the school to meet its goals. | The school has established its improvement plan based on need, but plans to conduct a full inventory of its resources in order to carry out its goals. | The school has an improvement plan, but its goals are not always based on need, and there is uncertainty as to what the available resources are, and how they can be used to address its goals. |

## Accountability for Results and Continuous Improvement

The schoolwide review team, along with the outside reviewer if one is being used, should present the results to staff in the school, parents and other community members. The evaluation will provide a roadmap for the future progress of the schoolwide program, so it is very important that the presentation and any accompanying materials

be clear, understandable, and avoid the use of technical jargon. The presenters should be prepared to answer any questions posed by stakeholders.

The first cycle of continuous improvement is completed when the school uses the results of the review to more effectively implement its schoolwide program and to improve student achievement. Once the findings have been widely disseminated and input has been received, the schoolwide team identifies which recommendations will be incorporated into the existing school plan. Some suggested steps for carrying out this process follow:

- Review the strategies and action steps originally proposed in the schoolwide plan.
- Use the findings and recommendations to identify the parts of the schoolwide plan that have been implemented ineffectively or not at all.
- Solicit the input of all stakeholders in identifying more effective strategies to achieve identified goals.
- Identify any additional training that is needed to improve implementation.
- Determine if additional resources are needed to implement the revised improvement plan and, if so, how they will be obtained.
- Re-establish responsibilities and timelines for implementing the revised plan.
- Communicate to all stakeholders what has been incorporated into the revised plan.
- Review the implementation review design that was used and make changes as appropriate to reflect plan modifications in preparation for the following year's evaluation.

The purpose of the annual review of the schoolwide program is to ensure that the program described in the schoolwide plan is implemented as designed and that its implementation has a positive effect on student achievement. Thus, the results of the annual review should not be perceived as a sign that the school should start over again with a new plan. Instead, the school should revise its existing plan to incorporate the revisions and reflect a revitalization of the school's commitment to implementing a schoolwide program that helps all students achieve at high levels. Examples of parent evaluation surveys for the Title 1 Part A annual review are found at Appendix F and Appendix G. The private school teacher cover memo is found at Appendix D

# 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 teachers.
6. Provide opportunities for professional development with Title I resources, and, to the extent practical, 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.

# SAMPLE REPORT FOR
# 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. **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 the PD were 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?

6. **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 does Title I staff collaborate with the Family Resource/Youth Service Center staff?

7. **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 paraeducator 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 at 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:

- The project is particularly designed to meet participants' special educational needs.
- 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.
- Paraeducators paid with Title I, Part A funds work closely with the regular classroom teacher. The classroom teacher is ultimately responsible for the instructional services to participating children in the absence of Title I, Part A.
- 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.

# 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 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.

**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.

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***The following link in Infinite Campus is a resource for Title 1 Data Standards:***
***http://education.ky.gov/districts/tech/sis/Documents/DataStandardTitleI.pdf***

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

SCHOOL:
TEACHER:
GRADE:

**INSTRUCTIONAL AREA:** Reading/Language Arts

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 |
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Other objective criteria such as diagnostic tests may be added.
The criteria could include reading in the content areas.

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

# COMMUNITY ELIGIBILITY PROVISION

**Definition:** Section 104(a) of the Healthy, Hunger-Free Kids Act of 2010 (Act) amended section 11(a)(1) of the Richard B. Russell National School Lunch Act to provide an alternative that eliminates the need for household applications for free and reduced-price meals in high-poverty LEAs and schools. This alternative, which is now part of the NSLP and SBP, is referred to as the Community Eligibility Provision (CEP).

To be eligible, LEAs and/or schools must meet a minimum level of "identified students" for free meals in the year prior to implementing CEP; agree to serve free breakfasts and lunches to all students; and agree to cover with non-Federal funds any costs of providing free meals to students above the amounts provided by Federal assistance. Reimbursement for each LEA or school is based on claiming percentages derived from the percentage of identified students, i.e., students certified for free meals through means other than individual household applications. The claiming percentages established in the first year for an LEA or school may be used for four school years and may be increased if the percentage of identified students rises for the LEA or school.

For further guidance concerning the Community Eligibility Provision (CEP) and requirements under NCLB, Title I Part A please visit:

http://www2.ed.gov/programs/titleiparta/legislation.html

# ACCOUNTABILITY

# SCHOOL AND DISTRICT ACCOUNTABILITY UNDER UNBRIDLED LEARNING

The mandates of 2009's Senate Bill 1, along with state regulations, provide the blueprint for Kentucky's public school accountability model.

Senate Bill 1 required Kentucky to begin a new assessment and accountability system in the 2011-12 school year. The assessment and accountability model is a balanced approach that incorporates all aspects of school and district work and is organized around the Kentucky Board of Education's four strategic priorities: next-generation learners, next-generation professionals, next-generation support systems and next-generation schools/districts. Achievement, measured by tests in reading, mathematics, science, social studies and writing, and program reviews in non-tested subjects such as arts and humanities and practical living/career studies are the heart of the model. Kentucky's model also places importance on identifying and closing achievement gaps among groups of students; providing support for low-performing schools; and linking teacher and principal evaluation information to educator preparation programs. The ultimate goal of the Unbridled Learning accountability model is to ensure that all students are prepared for college and/or career by the time they graduate from high school. Schools and districts will have annual measureable objectives to reach in all of these areas. Additional measures, such as Program Reviews and percentages of effective teachers and leaders, will be added in future school years.

Each school and district will receive an overall score on a scale of 0 to 100, and each will be classified to determine recognition or support. There are four main classifications: Distinguished, Proficient, Progressing and Needs Improvement. Each year, based on those classifications and overall scores, schools and districts will be placed in categories for the purposes of recognition, support and consequences:

- **Kentucky Schools or Districts of Distinction** will include the highest-performing elementary, middle and high schools or districts – those that score at the 95th percentile or higher on the overall score.
- **Kentucky Highest-Performing Schools or Districts** will include elementary, middle and high schools or districts that score at the 90th percentile or higher on the overall score.
- **Kentucky High-Progress Schools or Districts** will include Title I and non-Title I schools showing the highest progress, as compared to their peers, and school districts showing the highest progress, as compared to their peers.
- **Kentucky Focus Schools or Districts** will include the bottom 10% of schools and districts whose achievement gap scores are low, high schools with graduation rates below 60% for two consecutive years and schools in which specific student groups' scores are low.
- **Kentucky Priority Schools or Districts** will include schools that have been identified as "Persistently Low-Achieving" (PLAs) as defined by KRS 160.346 and districts whose overall scores are in the bottom 5% of overall scores for all districts that have failed to make AMO and AYP for the last three consecutive years.

- **In order to exit Focus or Priority status, a school or district must meet AMO and AYP for two consecutive years and must no longer be identified by the applicable percent calculation.**

The Schools or Districts of Distinction, Highest-Performing Schools or Districts and High-Progress Schools or Districts will receive recognition of their achievements, such as Web logos and other promotional materials. These schools also will serve as models for lower-performing schools.

Focus and Priority Schools and Districts will be subject to the following consequences:

**Support and Consequences for Priority and Focus Schools**

(1) Supports and consequences shall be applied to schools identified as Priority and Focus schools. These schools and their school districts shall receive notification from the Commissioner of Education within five (5) days of release of the annual accountability data identifying their category and the required supports and consequences that shall apply.
(2) Priority Schools identified pursuant to KRS 160.346 as persistently lowest-achieving schools shall receive a leadership assessment as required and described in KRS 160.346 and 703 KAR 5:180.
(3) A district containing a school(s) in the Priority School category shall require that school(s) comply with the provisions in this Section for no less than three years.
(4) A school that is identified in the Kentucky Priority or Focus School category for the first time shall revise the comprehensive school improvement plan (CSIP) and submit it for approval by the district within ninety (90) days of receiving notice from the Commissioner. The CSIP must:
    (a) Be developed with assistance from the district in using a variety of relevant sources that shall include perception data gathered from the administration of a valid and reliable measure of teaching and learning conditions to inform the needs assessment required by the CSIP.
    (b) For Priority Schools, document meaningful family and community involvement in selecting the intervention strategies that shall be included in the revised CSIP.
    (c) For Focus Schools, be developed using guidance from the Commissioner's Raising Achievement and Closing Gaps Council to inform their needs assessment and revised plan.
    (d) Include the support that will be provided by the district.
    (e) Be posted to the school website upon approval,
    (f) Address the following areas:
        (i) Curriculum alignment within the school, ensuring the school's instructional program is based on student needs, is research-based, rigorous, and is aligned with the Kentucky Core Academic Standards as described in 704 KAR 3:303;
        (ii) Provision of time for collaboration on the use of data to inform evaluation and assessment strategies to continuously monitor and

modify instruction to meet student needs and support proficient student work;

(iii) Professional development to address the goals of the plan;

(iv) Parental and community communication and engagement;

(v) Attendance improvement and dropout prevention;

(vi) Activities to target the underperforming areas of achievement, gap, growth, college and career readiness or graduation rate;

(vii) Activities to target demonstrators of weakness in program reviews;

(viii) Activities to target areas of need identified in teacher and leader effectiveness measures;

(ix) School safety, discipline strategies and other non-academic factors that impact student achievement, such as students' social, emotional and health needs;

(x) Design of the school day, week, or year to include additional time for student learning and teacher collaboration; and

(xi) Technical assistance that will be accessed.

(g) For Priority Schools, include short-term, monthly plans for the first 90 days of implementation, and require the establishment of teacher assistance teams with intensive year-round training focused on teacher effectiveness and school improvement in the professional development component of their plan.

(h) For Focus Schools shall include specific strategies to address gaps in achievement and graduation rates between the highest-achieving student performance group and the lowest-achieving student performance group

(5) Additional consequences shall apply to schools that remain in Priority and Focus status for more than one year, as follows:

(a) A school that is identified in the Kentucky Priority School category for the second or more consecutive times, or a school that remains in the Kentucky Focus School category and does not make AMO and AYP for three consecutive compilations of the Overall Score shall revise the CSIP as specified above and submit it for approval by the district prior to submission for approval by the Kentucky Department of Education (KDE) within ninety (90) days of receiving notice from the Commissioner. Upon approval by the KDE, the CSIP shall be posted to the school website.

(b) In addition to that requirement of paragraph, a school that is identified in the Kentucky Priority School category for third or more consecutive time, or a school that remains in the Kentucky Focus School category and does not make AMO and AYP for four consecutive compilations of the Overall Score, shall engage in the following:

(i) Participate in a set of improvement strategies outlined by either a school-level or a district-wide accreditation process.

(ii) If directed by the KDE, receive the assignment of a high-achieving partner school of similar demographics for mentor activities as directed by the KDE; and

(iii) Accept ongoing assistance and resources throughout the year as assigned or approved by the KDE.

(6) The KDE shall review and approve all submissions required by this Section.

(7) The KDE shall monitor implementation of CSIPs and shall provide necessary guidance based upon information gathered from the following:

(a) Progress reports from the school through the district;
(b) Data reviews;
(c) On-site observation; and
(d) Other information supplied at the district's or school's discretion.

## Supports and Consequences for Focus and Priority Districts

(1) Supports and consequences shall be applied to districts identified as Kentucky Priority or Kentucky Focus Districts. These districts shall receive notification from the Commissioner of Education within 5 days of release of the annual accountability data, identifying their category and the required supports and consequences that shall apply.

(2) Kentucky Priority Districts shall receive a leadership assessment as required and described in KRS 160.346 and 703 KAR 5:180.

(3) A district that is identified as a Kentucky Priority or Kentucky Focus District for the first time shall revise the CDIP within ninety (90) days of receiving the notice from the Commissioner. The CDIP must:

(a) Use a variety of relevant sources that shall include perception data gathered from the administration of a valid and reliable measure of teaching and learning conditions to inform the needs assessment required by the CDIP.
(b) Include the support to be provided to schools by the district.
(c) Be informed by guidance from the Commissioner's Raising Achievement and Closing Gaps Council.
(d) Be posted to the district website upon approval.
(e) Address the following areas:

(i) Curriculum alignment within the school(s), ensuring there is alignment with the Kentucky Core Academic Standards as described in 704 KAR 3:303;
(ii) Evaluation and assessment strategies to continuously monitor and modify instruction to meet student needs and support proficient student work;
(iii) Professional development to address the goals of the plan;
(iv) Parental and community communication and engagement;
(v) Attendance improvement and dropout prevention;
(vi) Activities to target the underperforming areas of achievement, gap, growth, college and career readiness or graduation rate;
(vii) Activities to target demonstrators of weakness in program reviews;
(viii) Activities to target areas of need identified in teacher and leader effectiveness measures; and
(ix) Technical assistance that will be accessed.

(4) In addition to the above requirements, the CDIP for Focus districts shall include specific strategies to address gaps in achievement and graduation rates between

the highest-achieving student performance group and the lowest-achieving student performance group.

(5) Additional consequences shall apply to districts that remain in Priority and Focus status for more than one year, as follows:

(a) A district that is identified as a Kentucky Priority District for the second or more consecutive times or a district that remains in the Kentucky Focus District category and does not make AMO and AYP for three consecutive compilations of the Overall Score, shall revise the CDIP as specified above and submit it for approval by KDE within ninety (90) days of receiving the notice from the Commissioner. Upon approval by KDE, the CDIP shall be posted to the district website.

(b) In addition, a district that is identified as a Kentucky Priority District for the third or more consecutive time, or that remains in the Kentucky Focus District category and does not make AMO and AYP for four consecutive compilations of the Overall Score shall engage in the following:

(i) Participate in a set of improvement strategies outlined by a district-wide accreditation process;

(ii) If directed by the KDE, receive the assignment of a high-achieving partner district of similar demographics for mentor activities as directed by the KDE; and

(iii) Accept ongoing assistance and resources throughout the year as assigned or approved by the KDE.

(6) The KDE will review and approve all submissions required above.

(7) The KDE shall monitor implementation of CDIPS and shall provide necessary guidance based upon information gathered from the following:

(a) Progress reports from the district;

(b) Data reviews;

(c) On-site observations; and

(d) Other information supplied at the district's discretion.

## Section 1003(a) School Improvement Funds

Kentucky must reserve 4% of its total Title I, Part A allocation for Section 1003(a) school improvement. 95% of the 4% must be allocated to districts that have Title I schools not meeting academic standards. **Kentucky will concentrate its reservation on Focus and Priority schools.** The district receives one district Section 1003(a) allocation to be used for all identified schools. The district determines how much is needed for each identified school to ensure that the school is provided the resources necessary to improve teaching and increase student achievement.

1. The district must collaborate with school councils and staffs at the identified schools to ensure buy-in and reform at the school level.
2. The district must retain control of the Section 1003(a) funds to ensure that the most effective school improvement strategies are being implemented at the identified schools.
3. The district must use the Section 1003(a) funds at the identified schools for strategies to eliminate the achievement gap in populations of economically disadvantaged students, students from major racial and ethnic groups, students with disabilities, and students with limited English proficiency. Strategies include the following:
    - Interventions for students in the groups not making adequate yearly progress and identified through a diagnostic tool;
    - On-going, job-embedded professional development that directly addresses academic achievement problems (such as increasing content knowledge, using scientifically-based instructional strategies, aligning classroom activities with content standards and assessments, training to analyze classroom and school-level data and to use the data to inform instruction).
4. The district may require that the identified school implement a comprehensive school reform program. Adopting a comprehensive reform program can be an effective strategy, especially if the school is in search of an external structure and technical assistance that will help it identify and address organizational and instructional issues. However, a program alone cannot address all of the identified needs of a school and cannot substitute for a coherent plan for systemic change.
5. The use of Section 1003(a) funds should be based on needs.
6. Section 1003(a) funds may not be used for administrative costs because the district administers this funding source as a part of Title I. Indirect costs may not be charged toward the grant.

## Other Information about Title I School Improvement Funds 1003(a)

1. Award Notification – Each district with funded schools receives an Award Notification with the allocation for the 2016-17 school year. The Title I school improvement funds are available from July 1, 2016 – September 30, 2018. However, funds should be expended during the 2016-17 school year, including summer activities.
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 320* for the Title I school improvement funds for 2016-17.

## Resources

1. For questions about Unbridled Learning Accountability, including the identification of Focus and Priority schools, contact the KDE Division of Assessment Support at (502) 564-4394.
2. For information about closing achievement gaps, refer to The Education Trust's website at http://www.edtrust.org/issues/pre-k-12/closing-the-gaps .
3. For information about self-assessment and continuous improvement activities tools, refer to WestEd's website at http://www.wested.org
4. 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.
5. This Web site provides access to the ERIC database, a conference calendar, and other information about the Educational Resources Information Center. www.eduref.org
6. This Web site provides information about ASCD's numerous publications, professional development activities, and affiliates and networks. www.ascd.org
7. Search by keyword or by the Topic List, or browse the Awards for extensive reviews on current education sites. www.education-world.com
8. This Web site contains links and resources selected by this coalition of school districts in the 66 largest U.S. cities. www.cgcs.org
9. This Brown University organization offers research-based solutions for school reform. The Education Alliance addresses the needs of diverse student populations in the public schools by offering a variety of educational resources. http://www.alliance.brown.edu/
10. Ed Trust is an independent nonprofit organization whose mission is to make schools and colleges work for all of the young people they serve. This organization provides credible information about what works in high performing, high poverty schools. http://www.edtrust.org/
11. This Web site is dedicated to reform and innovation in middle schools, with an emphasis on urban issues. It offers links to many online resources. www.middleweb.com
12. CRESST conducts research on important topics related to K-12 educational testing. The Web site contains many of its research reports and special links for parents and teachers. http://www.cse.ucla.edu/
13. Decision-Making and Planning Tool for the School Improvement Grant
14. NCELA offers an array of services through the Internet, including stories of successful language learning programs, subscription registration for the NCELA electronic newsletter, and discussion groups. http://www.ncela.us/
15. NCPIE is a coalition of major education, community, public service, and advocacy organizations working to create meaningful family-school partnerships in every school in America. This Web site offers up-to-date information about policies and practices that affect education, and practical ways that parents can become effective partners with schools in improving their children's education. www.talkaboutrx.org

# 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 district's 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 online at http://edpubs.ed.gov/Default.aspx or by email at edpubs@edpubs.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/archived.html.

**No Child Left Behind** Web site at: http://www.ed.gov/nclb/landing.jhtml.

**Giving Parents Options**: Strategies for Informing Parents and Implementing Public School Choice And Supplemental Educational Services Under No Child Left Behind http://www.ed.gov/admins/comm/choice/options/index.html.

**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 WWC Update on the Web at http://ies.ed.gov/ncee/wwc/, 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.

**The Missing Piece of the Proficiency Puzzle**, Recommendations for Involving Families and Community in Improving Student Achievement, Commissioner's Parents Advisory Council, Final Report to the Kentucky Department of Education, June 2007. Building on our state's long experience with reform, Commissioner's Parent Advisory Council strongly recommends that Kentucky become the first state in the nation to set a standard for family and community involvement that is focused on improving student achievement. This standard includes six objectives designed to involve families and the community to improve student achievement, so that our state will meet its goal of all children reaching proficiency. For more information visit: The Missing Piece of the Proficiency Puzzle.

## 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.

For parent involvement evaluation forms please see Appendix A or Appendix B and for the private school teacher cover memo please see Appendix D

**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 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; and
- Barriers exists 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 and common core state 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.

## Annual Meeting

All Title I schools must:

1. Convene an annual meeting, at a convenient time, and invite parents of participating children. The meeting should inform parents of their school's participation in Title I, Part A, explain the requirements of the parent involvement statute, and the parent's right to be involved.
2. Offer a flexible number of meetings (such as before or after school and evenings), and may provide transportation, child care, or home visits.
3. Involve parents, in an organized, ongoing and timely way, in the planning, review, and improvement of the Title I program including the planning, review and improvement of the school parental involvement policy and the joint development of the schoolwide program plan.
4. Provide parents with timely information about the Title I program; a description and explanation of the curriculum, the forms of academic assessment including a definition of proficiency; opportunities for regular meetings and to participate in decisions relating to the education of their children and the opportunity to respond to any suggestions.

5. Provide an opportunity for parents to submit comments on the schoolwide program plan when the school makes the plan available to the district.

**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, and 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?
- (Optional) 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. Does the school hold an annual meeting, at a convenient time, and invite parents of participating children? Does the meeting inform parents of their school's participation in Title I, Part A, explain the requirements of the parent involvement statute, and the parent's right to be involved?
2. Was the school Parent Involvement Policy developed jointly and agreed upon by the parents of participating Title I students through meaningful consultation?
3. Has the Parent Involvement Policy been distributed to parents?
4. 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 on an annual basis?
    - Findings from the annual evaluation and their utilization in revising the Parent Involvement Policy?
5. 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?

6. Was the School-Parent Compact developed with the parents of the participating Title I children?
7. Does the compact describe how parents, the entire school staff and students will share the responsibility for improving student achievement?
8. Does the compact describe how the school and parents will build and develop a partnership to achieve Kentucky's high standards?
9. 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?
10. 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 is sent to the parents in the language used at home?
11. Does the school provide full opportunity for the participation of parents with limited English proficiency or with disabilities?
12. Does the school conduct an annual evaluation of the effectiveness of the school's Parent Involvement Policy and parent involvement activities?
13. Does the school have documentation to substantiate the above answers? Such documentation could include agendas from parent meetings or trainings and comments from parents.

## 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.
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.
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.familieslearning.org
6. Appalachian Regional Comprehensive Center https://arccta.org/
7. Ed Trust Parent and Community Involvement http://www.edtrust.org.
8. Prichard Committee Parent Involvement Toolkit www.prichardcommittee.org
9. Kentucky Parent Information & Resource Center provides local, regional, and statewide support for parents to enhance their involvement in their children's education by implementing effective parental involvement policies, programs and activities that will improve children's academic achievement.

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 be 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:**<br>"This compact will promote effective working relationships to improve student achievement." | **Compact Linked to Learning:**<br>"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<br>• Send my child to school every day<br>• Keep in contact with school once a month | Parents Pledge: I will<br>• Let the teacher know if my child has any problems with learning.<br>• Use reading and math materials the school sends home each week to help |

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

CENTER FOR Parent Leadership

## 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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CENTER FOR Parent Leadership

# 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. A Title I Toolkit with sample documentation is also available on the U.S. Department of Education's website at http://www2.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf .

## 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, including services to private school children beginning at the same time as the public school program;

- 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 academic standards;
- The district annually assesses the progress of the Title I, Part A program and students toward enabling private school children to meet the standards agreed upon through consultation with the private school; please see Appendix C for teacher evaluation of Title I, Part A effectiveness for students.
- A proportionate set aside is provided to the private school for extended school services (i.e. summer school), parent involvement, and professional development.

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 in Appendix E.) 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 individually address letters to private schools with the "declaration of participation" for Title II, the letter needs to explain the difference between Title I, Part A and the other program. When a child from the district's attendance area attends a private school in another district, Title II 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 and students 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 based 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. According to the *Title I Services to Eligible Private School Children, Non-Regulatory Guidance* B6: (http://www2.ed.gov/policy/elsec/guid/edpicks.jhtml?exp=7 ) If a district does not collect the names of low-income families to verify poverty numbers provided by the private school, then the private school officials must maintain the poverty data in their files. If district officials or auditors want to review the poverty data, they may review the data at the private school.

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 norm-referenced 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, begin at the same time as services to public school children 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. Paraeducators must work under the direct supervision and close proximity 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. 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, 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;
- Determine during consultation what constitutes annual progress for the Title I, Part A program;
- 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 E, Section H, 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.

## Services to Private School Children: Guidelines for Allowable Title I Expenditures

**Timely and Meaningful Consultation:** Sec. 1120(b) of the No Child Left Behind Act and Sec. 200.63 of the Title I regulations require that timely and meaningful consultation occur between the local educational agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, their teachers, and their families to participate in Title I programs, and shall continue throughout the implementation and assessment of activities.

**Allowable Program Expenditures:** Title I funds are expended to implement academic research-based programs that help students improve their academic achievement (i.e., reading, mathematics, etc). Title I program expenditures can include the following**:**

1. Books, materials, and equipment necessary to implement the Title I program (The LEA retains title to the books, other materials, and equipment purchased with Title I funds. Materials, etc. purchased with Title I funds may be used only by Title I participants. Each item purchased with Title I funds must be labeled "Property of **district name**." The labels should not be either easily erased or removable.);
2. Extended-day services;
3. Summer programs;
4. Saturday programs;
5. Counseling programs;
6. Computer-assisted instruction (CAI) with non-instructional computer technicians who supervise computer labs, maintain discipline, and escort students to and from class (Their salaries are an administrative cost under Sec 200.77(f) of the Title I regulations and may not be charged to funds generated by private school children from low-income families, which is for instruction.);
7. Home tutoring;
8. Computers and software products; and
9. Take-home computers (The LEA should ensure that families and students are properly trained in computer and software use.).

**Allowable Expenditures for Service Providers:** These expenditures include:

1. Salaries and fringe benefits for teachers directly hired by the LEA;
2. Salaries and fringe benefits for qualified paraprofessionals directly hired by the LEA and supervised by public school teachers who are located in the same building;
3. LEA contracts with third-party providers (The contract should provide information that ensures the LEA that the Title I program contract will be administered in accordance with all requirements. The LEA must exercise oversight of the instructional program and administrative costs); and
4. LEA contracts with retired public or private school teachers to teach at the private school during the school day and before or after school.

**Location of Services and Equipment:**

1. Title I services must be provided in a separate space that is under the LEA's control when Title I services are being provided;
2. If the services are provided in a library or private school classroom, the space must be separate and partitioned off; and
3. Computer equipment and other supplies purchased with Title I funds may be used only by Title I students in the Title I program.

**Sample Agendas for Consultation Meetings Throughout the School Year**

Agenda for early winter meetings (typically in December or January) in preparation for the next school year

1. Welcome and introduction.
2. Overview of Title I program.
3. Options for service providers: the LEA or a third-party.
4. Discussion on the collection of poverty data: What is available from private schools? Is the survey with extrapolation a possibility? Should the LEA consider proportionality?
5. Discussion on possible program designs: Should it be a pullout program or a before or after school program? Which grade levels and what academic subjects should the Title I program encompass? Do the private school officials have space in their schools for the LEA to provide Title I services?

Agenda for late winter or early spring meetings (typically in February or March)

1. Review of poverty data collected and the estimated amount of funds available for services. Decide if the pooling among private schools option will be used.
2. Determination of the multiple, educationally related and objective criteria used to select eligible children who reside in Title I public school attendance areas.
3. Review of options for service providers.
4. Plan a program design workshop for private school principals and LEA instructional specialists.
5. Discuss how the Title I program will be evaluated: What standards and assessment will be used? What will be annual progress and what percentage of participants must meet that progress in order for the program to be effective.
6. Establish the date that Title I services will start.

7. Discuss the professional development needs of the private school teachers of Title I participants based on the most recent student assessment data
8. Discuss the needs of the parents of participants: How can parents better support their children's instruction?

Agenda for late spring meetings (typically in April or May)

1. Finalize the designs of the Title I programs—ensure materials have been ordered, LEA personnel who are providing Title I services are identified and in place, and service start date is firm.
2. Finalize professional development programs and activities for private school teachers of Title I participating students. Establish a calendar for the next year's activities.
3. Finalize parent involvement programs and activities for parents of participants. Establish a calendar for next year.
4. Review current year's assessment data for current year participants to determine if any adjustments to instruction should be made.
5. Provide affirmation forms for signature.

Agenda for meeting one month after program has begun (typically in the month of October)

1. Review the implementation of the program for the first month.
2. Discuss changes in roster of eligible children and the possibility of adding children to the program, as needed, depending on space and time.
3. Review process for coordinating Title I program with classroom teachers.
4. Review implementation of the professional development program.
5. Review implementation of the parental involvement program.

**LEA Affirmation of Consultation With Private School Officials Including Student Selection Criteria**

Sec. 1120(b) of the Elementary and Secondary Education Act and Sec. 200.63 of the Title I regulations require that timely and meaningful consultation occur between the local education agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs under this act. Consultation shall continue throughout the implementation and assessment of activities under this section.

The following topics must be discussed during the ongoing consultation process:

- How the LEA will identify the needs of eligible private school children;
- What services the LEA will offer to eligible private school children;
- How and when the LEA will make decisions about the delivery of services;
- How, where and by whom the LEA will provide services to eligible private school children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with a third-party provider;
- How the LEA will assess academically the services to eligible private school children in accordance with Sec. 200.10 of the Title I regulations and how the LEA will use the results of that assessment to improve Title I instructional services;

- The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with §200.64, the proportion of funds that will be allocated to provide these services;
- The method or sources of data that the LEA will use under §200.78 to determine the number of private school children from low-income families residing in participating public school attendance areas, including whether the LEA will extrapolate data, if a survey is used;
- The equitable services the LEA will provide to private school teachers who teach Title I students and the professional development program that will be designed to meet their needs;
- The equitable services the LEA will provide to meet the needs of families of Title I children and the family involvement program that will be designed to meet their needs;
- If the LEA disagrees with the views of the private school officials on the provisions of services through a contract, the LEA must provide the private schools the reasons in writing why the LEA chooses not to use a contractor.

Consultation included meetings with private school officials before the LEA made any decision that affected the opportunities of eligible school children to participate in Title I, Part A, programs. Such meetings will continue throughout the implementation of the program and will include assessment of services provided.

**Documenting Method to Determine Greatest Need**

The following multiple, educationally related, objective criteria are used to determine private school student eligibility for the Title I, Part A, program:

| Grade Level | Criteria | Method to Determine Greatest Need |
|---|---|---|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

I affirm that the required consultation has occurred.

Signature of private school official  Name of private school official  Date

**Worksheet to Determine the Amount of Title I Funds for Equitable Services Based on Enrollment**

1. Districtwide Instructional Program(s) Reservation (does not apply to preschool programs) in participating public school attendance areas:

   _____ (number of low-income private school students) x $_____ Attendance Area School Per Pupil Allocation = $_____for Equitable Services

**Worksheet for Determining Parent Involvement, PD, and School Extension Set-Asides for Private School Equitable Services**

**Parent Involvement Reservation** under Sec. 1119 of ESEA (This is a MUST, for the district set-aside funds for parent involvement.

| No. of private school children from low-income families in participating school attendance areas | | Total no. of children from public and private school low-income families in participating school attendance areas | | |
|---|---|---|---|---|
| _____ | ÷ | _____ | = | _____ % of reservation |

_____(%of Reservation) x $_____**Parent Involvement Set-Aside** = $_____ for Equitable Services to private school

**Professional Development Reservation** under Sec. 1119 of ESEA (This is a Must, if the district has set-aside funds for professional development that is not required)

In participating public school attendance areas:

| No. of private school children from low-income families participating school attendance areas | | Total no. of children from public and private school low-income in families in participating school attendance areas | | |
|---|---|---|---|---|
| _____ _ | ÷ | _____ | = | _____ % of Reservation |

_____ (% of Reservation) x $_____**P.D. Not Required Set-Aside** = $_____ for Equitable Services to private schools

**School Extension Reservation** under Sec. 1119 of ESEA (This is a Must, if the district has set-aside funds for a school extension program such as summer school or before/after school program)

In participating public school attendance areas:

| No. of private school children from low-income families participating school attendance areas | | Total no. of children from public and private school low-income in families in participating school attendance areas | | |
|---|---|---|---|---|
| _____ | ÷ | _____ | = | _____ % of Reservation |

____ (% of Reservation) x $_____**School Extension Reservation** Set-Aside = $_____ for Equitable Services to private schools

**Sample Achievement Chart for Title I Private School Students and Subsequent Program Modification Discussions**

Private Schools must annually report the progress of Title I students to the district. The instruments used and annual progress goals for student reading achievement were determined in consultation between public and private school officials.

District Chart of the Instruments, Annual Progress Reading Goals, and Percentage of Title I Students Achieving Goals by Grade Level

| Reading Achievement of Title I Students | | | |
|---|---|---|---|
| Grade Level(s) | Instruments | Annual Progress Reading Goals | Percent of Title I Students Achieving Reading Goals |
| Kindergarten | Kindergarten checklist | 100% will master each item on the checklist. | 92 |
| Grades 1–2 | Publisher's test from private school reading series | 100% will read at grade level. | 75 |
| Grades 3–6 | Standardized test taken by all private school students | 100% will score at the 60th percentile or above. | 70 |

Using This Chart to Make Decisions on Modifications to the Title I Program

The percentage of children achieving the annual progress goals necessitates the public and private school officials to ask: Is the percentage of Title I students achieving the annual progress goals acceptable?

- In kindergarten, 92 percent of the students master every item on the checklist. What strategies did the district use to achieve this goal? What additional approaches should the LEA use for the 8 percent of the students who did not make the goal?
- In grades 1–2, 25% of the students are not at grade level in reading. Should the district modify the Title I program or should the district continue the program with no changes?
- In grades 3–6, almost one-third of the students (30%) scored below the 60th percentile. Should the district modify the Title I program or should the district continue the program with no changes?

## Sample: District Procedures for Using Title I Assessment Information to Develop a Program Evaluation Plan and Subsequent Program Modifications

### Title I Program Assessment

- After the assessment and analysis of the appropriate data, priorities will be established that meet the needs of students.
- A program model and schedule will be aligned with the established priorities.
- An instructional program will be designed to supplement the private school's core curriculum.
- The private school uses _____ reading materials for the core curriculum.
- The private school uses _____ mathematics materials for the core curriculum.

### Evaluation Plan

- School district officials must assess annually the progress of the Title I program toward enabling private school participants to meet the agreed-upon standards. Student performance results will be reviewed annually. When the standardized test information is available, the Title I teacher(s) and the private school official(s) will meet to analyze the assessment results for the participating students. Their goal is to determine whether or not the level of student performance, as measured by the standardized test, has met or exceeded the desired outcomes agreed to in consultation.

- Based on consultation, the effectiveness of the Title I program at each private school will be measured through comparing the targeted percentage of students reaching the established performance-level standard and the agreed-upon year-end percentage of students achieving the performance level.

- In the event the Title I program fails to meet the annual progress target, consultation will occur to examine the student performance data to determine whether modifications are required.

**Sample: District Procedures for Using Title I Assessment Information to Develop a Program Evaluation Plan and Subsequent Program Modifications (continued)**

## Determining Annual Progress Measure

Agreed-upon performance levels (standards) used to determine the annual progress of the Title I program at the private school are:

### Reading/Language Arts

| | Instrument | Student Performance Level | Annual Progress Measure (% of Students Achieving Performance Level) | Year-end Percentage Achieving Goals |
|---|---|---|---|---|
| **Grades K-2** | | | | |
| **Grades 3-12** | | | | |

### Mathematics

| | Instrument | Student Performance Level | Annual Progress Measure (% of Students Achieving Performance Level) | Year-end Percentage Achieving Goals |
|---|---|---|---|---|
| **Grades K-2** | | | | |
| **Grades 3-12** | | | | |

## Program Modifications

- If the program fails to meet the annual progress target, consultation will occur to examine the student performance data to determine needed modifications. To improve student achievement, the modifications will include, but will not be limited to:
  - Increased Title I teacher time;
  - Implementation of Title I services for extended day or extended year, or both;
  - Increased focus or time or both for specific grade level(s), if a need is demonstrated; and
  - Evaluation of supplemental materials for effectiveness in improving student academic achievement.

- The consultation process will include a review of the performance standards for program evaluation in the following year.

- The standards and progress measures will be modified, as necessary.

| SUGGESTED TIMELINE FOR CONSULTATION WITH PRIVATE SCHOOL OFFICIALS* | | |
|---|---|---|
| **MONTH** | **DISTRICT ACTIVITY** | **EXPLANATION** |
| November/December<br>Prior to next school year | Obtain complete list of all private schools with students who are residents of the district.<br><br>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<br>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*:<br>• Free and reduced priced lunch (District must use, if available)<br>• Poverty survey that parents complete (District must extrapolate)<br>• Alternative poverty data such as scholarships, TANF, Medicaid, etc.<br>• Proportionality<br>* 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<br>Prior to next school year | Match addresses of private school students from low-income families to participating public school attendance areas.<br><br>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.<br><br>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. | |
| April/May<br>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.<br><br>Private school officials provide lists | Multiple educationally related criteria must meet the requirements in Section 1115(b) of Title I. |

| SUGGESTED TIMELINE FOR CONSULTATION WITH PRIVATE SCHOOL OFFICIALS* | | |
|---|---|---|
| **MONTH** | **DISTRICT ACTIVITY** | **EXPLANATION** |
| April/May<br>Prior to next school year | 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.<br><br>Discuss with private school officials the needs of selected participants and appropriate Title I services to serve those needs.<br><br>Design Title I services that serve participants' needs based on consultation.<br><br>Determine with the private school officials the standards and annual assessments for measuring progress of the Title I program.<br><br>Define annual progress.<br><br>Determine criteria for making program modifications when annual progress is not achieved.<br><br>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. | 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. |
| May/June<br>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.<br><br>Design activities that district implements the next school year (independently or in conjunction with district activities) for teachers and families of participants.<br><br>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. | Equitable services for teachers and families of participants apply to funds reserved under Sections 1118-1119.<br><br>Districts must provide opportunities for consultation with private school officials if program is modified or private school officials request continued discussions.<br><br>These actions ensure that programs will begin at the start of the school year.<br><br>Consultation should be completed for the next school year prior to the district submitting its Title I report to the state. |

| SUGGESTED TIMELINE FOR CONSULTATION WITH PRIVATE SCHOOL OFFICIALS* | | |
|---|---|---|
| **MONTH** | **DISTRICT ACTIVITY** | **EXPLANATION** |
| May/June<br>Prior to next school year | 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.<br><br>Obtain written affirmation from private school officials or their representatives that timely and meaningful consultation has occurred.<br><br>Complete all necessary Board reports, contract negotiations, ordering of material, hiring of teachers, etc. | |
| August<br>Prior to beginning of school year | Meet with private school officials to report on readiness of Title I program for private school students.<br><br>Begin Title I services (when school starts) for eligible students identified the previous spring. | 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 | Request a list of newly enrolled students who meet the eligibility criteria. Consult with private school officials on how Title I services can be provided to eligible new students.<br><br>District provides private school officials with final lists of Title I programs, and Title I teachers.<br><br>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.<br><br>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.

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

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

# 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) 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. 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. Contact Neil Watts at Monica.Shack@education.ky.gov or 502-564-3791 for specific questions.

## 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 revised 2nd edition October 2009 version of the Kentucky Paraeducator Assessment (KPA) is the state's formal academic assessment.

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% 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.

### 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. Paraeducators 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, athletic coach 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.

## 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. The supervising teacher should plan and prepare lessons that the paraeducator will implement. 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.

Paraeducators who provide services to eligible private school students and are employed by the district must be under the direct supervision of a 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 employees the teacher.

Because paraeducators provide instructional support, they should not be creating lessons for whole group instruction or introducing new skills, concepts or academic content to the whole class. Paraeducators working in a program supported with Title I, Part A funds may provide the following services, under the direct 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 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 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, paraeducators 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 who need English language acquisition and language enhancement.
4. Title VI funds may be used to provide professional development for teachers and other instructional personnel providing instruction to students if the district. Title VI spending restrictions due to improvement status have been waived.

# 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 mission of the Kentucky Department of Education's Homeless Education Program 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 Homeless Education Program grants include the following school districts: Ashland Independent, Bullitt County, Christian County, Covington Independent, Cumberland County, Eminence Independent, Fayette County, Fulton County, Greenup County, Hazard Independent, Henderson County, Jefferson County, Knott County, Newport Independent, Paducah Independent, Pike County, Whitley County. The grants are awarded on a three-year cycle which began July 1, 2012.

## Definitions

**Enroll and Enrollment:** Attending classes and participating fully in school activities.

**Unaccompanied Youth:** 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 for parents or unaccompanied youth to 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 that 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.

## 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 on the Title I Application in GMAP for homeless students in non-Title I schools and describe the educational services for these students. The services to homeless students in non-Title I schools must be

equitable to services provided to Title I students attending Title I schools. If all schools are served by Title I, funds are not required to be set aside; however, a description must be included to describe the educational services that are being provided.

3. The district must also describe services provided to homeless students in Title I schools. The district must provide a description of services for Homeless students in Title I participating schools on the Title I Application in GMAP.
4. 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 Application in GMAP.
5. 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.
6. The district must ensure that homeless children and youth are identified by school personnel and through other entities and agencies.
7. 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.
8. The district must mediate all enrollment disputes in accordance with the enrollment disputes provision.
9. 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.
10. The district must immediately enroll unaccompanied youth in school, even if there is a dispute over school enrollment or placement.
11. The district must assist children and youth in obtaining necessary immunizations or medical records.
12. 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.
13. 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.
14. The district must ensure that the school selected for attendance immediately enrolls the child/youth in school, even if he or she lacks records normally required for enrollment. Such records include the previous academic records, medical records, proof of residency, or other documentation.
15. The district must immediately contact the last school attended to obtain relevant academic and other records.
16. 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 and Privacy Act of 1974.
17. 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.

18. 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.
19. The district may use funds for professional development to heighten awareness of the plight of homeless children for his/herself and school employees.
20. 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 Application in GMAP 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 that 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 district 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.

**The National Association for the Education of Homeless Children and Youth (NAEHCY)** http://www.naehcy.org/
This site is the voice and social conscience for the education of children and youth experiencing homelessness. Publications related to unaccompanied youth are available at this site under the Educational Resources Link.

**Federal Resources for Feeding Homeless Children and Youth**
http://www.azed.gov/wp-content/uploads/PDF/FederalResourcesforFeedingHomelessChildrenandYouth.pdf
This site includes information on federal nutrition requirements as they relate to homeless students.

# LOCAL INSTITUTIONS FOR NEGLECTED CHILDREN

NCLB Title I, Part A, Section 1113

# 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 not considered a private school.
3. Funds – The amount of funds generated by children in local institutions for neglected children is 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, on-going manner.
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 Application in GMAP showing the districts set-asides must contain a brief description of Title I educational services for children in locally operated institutions for neglected children. 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 to 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 to help children in the transition from the institution to school.
    - Computers and software to assist children with homework, reinforce concepts, etc.
    - Books and materials such as encyclopedias, dictionaries and high interest/low vocabulary books, etc. to 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. KDE may retain the funds if KDE assumes educational responsibility for the neglected children. If the institution closes and the children are transferred to an institution in another district, KDE must adjust the allocations of the two districts to reflect the transfer.

The chart below shows the name of the district, the name of the local institutions for neglected children and the facility case load. The children are a part of the formula children used to calculate the Title I, Part A allocation along with funds generated. 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.

| District | Institution | Facility Case Load | Funds Generated for the District |
|---|---|---|---|
| Barren | Spectrum Care Academy | 20 | $49,772.50 |
| | Kinder Haven, Inc. | 19 | |
| Beechwood Ind. | DCCH Center for Children and Families | 43 | $34,110.00 |
| Boone Co | Children's Home of Northern KY | 28 | $25,484.00 |
| Bullitt Co | Spring Meadows Children's Home | 19 | $18,542.00 |
| Calloway Co | Community Youth Services | 4 | $3,771.00 |
| Campbell Co | Holly Hill Children's Services | 12 | $9,744.00 |
| Covington Ind. | Homeward Bound Shelter | 3 | $32,523.00 |
| | Children's Home of Northern KY | 21 | |
| Danville Ind. | Sunrise Children's Services | 31 | $31,753.00 |
| Elizabethtown Ind. | Glen Dale Center | 15 | $16,034.00 |
| Jefferson | Uspiritus Bellewood School | 42 | $618,383.00 |
| | Boys and Girls Haven School | 28 | |
| | USpiritus Brooklawn School | 140 | |
| | Home of the Innocents | 131 | |
| | Mary Hurst Academy | 78 | |
| | St. Joseph Children Home | 38 | |
| Jessamine Co. | All God's Children | 14 | $13,567.00 |
| Larue Co. | The Life Connection | 42 | $43,834.00 |
| Murray Ind. | Community Youth Services | 7 | $6,722.00 |
| Paducah Ind. | Community Youth Services | 6 | $7,588.00 |
| Perry Co. | Buckhorn Children's Center | 38 | $60,750 .00 |
| Pulaski Co. | Combs Residential Services | 3 | $3,061.00 |
| Wolfe Co. | Dessie Scott Children's Home | 34 | $49,729.00 |

# 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 ensuring children enter kindergarten ready to learn and ready to succeed.

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=In

## 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 and 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 whose family income does not exceed 150 percent of the federal poverty level, all three and four-year-old children with 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.

**The Kentucky Early Childhood Standards document was designed to reflect the range of developmental abilities typical of young children, birth to five 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://kidsnow.ky.gov/Improving-Early-Care/Documents/Kentucky%20Early%20Childhood%20Standards.pdf

## 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, such as developmentally appropriate measures of child development. When a Title I preschool is funded at the school level (but not districtwide), the 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, 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

Since 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). The revised 2nd edition October 2009 edition of the Kentucky Paraeducator Assessment (KPA) is the state's formal academic assessment.

## 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.

# DISTRICT PLANNING

# DISTRICT PLANNING

| Requirement | Compliance |
|---|---|
| District Assurances | Superintendent e-mail that includes the "Declaration of Compliance" statement below as the text of the e-mail. The statement can be found electronically on KDE's website here. This e-mail must be sent to the "KDE Assurances" mailbox on the Global Address List by June 30 of each year. This is a requirement to release federal and state funds. |
| Comprehensive District Improvement Plan (CDIP) | The CDIP is completed based on assigned planning tasks and due dates found within ASSIST. Schools/Districts that are in NCLB consequences 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. |
| Categorical Program Reports (i.e. Title I Application in GMAP) | 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 email 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, school councils, 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 recommended that the district Title I coordinator attend a school 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 (i.e., 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% 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 common core 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 and SBDM Staffing Allocations

Assignment of personnel to implement Title I services must be based on the results of the school's needs assessment. The principal determines the assignment of specific teachers to specific grades or academic courses based on certification and evaluation

criteria. The principal must work within the parameters of the school council policy (i.e., assignment of staff time policy) to determine the scheduling of teachers to particular programs within the school day. The principal has the authority to assign Title I paid staff in a schoolwide program within the school as long as it is within the parameters of the Title I budget and the fulfillment of the Title I program requirements. If a school is no longer served by Title I, the district is to reassign the Title I paid personnel according to local district policies and state law.

Annually, each district is required to review its staffing allocation formula, based in KRS 157.360. Any revisions to the staffing formula must be submitted to KDE's SBDM office for review and approval. All current districts' staffing formulas are kept on file with KDE's SBDM office. The staffing formula is used to determine the number of staff that each school must have to meet the statutory class size requirements within KRS 157.360.

By May 1 of each year, the school council must receive information from the district that contains the number of staff which they will have for the upcoming school year, based on the staffing formula. As part of the decision making authority for school council, the school council must determine the job classification for each of those positions allocated to them. They must fill those positions first before adding staff from Title I funds. However, as part of the school council authority, they may place these teaching positions at any grade or with any subject they chose based on the needs assessment of the school and to fulfill educational requirements of the district (e.g., course requirements, graduation requirements). The maximum class size numbers from the formula are used only for the purpose of determining the staffing allocation numbers, not for placing students in classrooms. The number of students per classroom is determined with the job classification decision and with the school council policy (i.e., assignment of students to classes and programs).

For schools who are exempt from SBDM or are a one-school district: these schools must adhere to the maximum class size in Kentucky Statute (i.e., KRS 157.360).

## Understanding KRS 157.360

When updating the staffing allocation formula, boards of education must adhere to guidelines in KRS 157.360. Base funding levels include:

24:1 for primary grades
28:1 for grade 4
29:1 for grades 5 and 6
31:1 for grades 7 to 12 [KRS 157.360(4)(a)]

An addition to these base level is a requirement for secondary schools that includes a maximum of 150 per-pupil hours [KRS 157.360(4)(b)].

Two parts of the staffing base funding levels can cause confusion for school council members and others in the school community: base levels for primary grades and the 150 per-pupil hours for secondary schools. Note that school councils are not bound by these maximum class size limits once the allocations are received by the school. School

councils determine, within the number of staff allocated, the job classifications for each of the positions.

Primary school is defined in KRS 158.031 as being multi-aged groupings. To this effect, the allocation of staff for primary school is based on the total number of students included in an enrollment from the time they enter school (i.e., kindergarten) to the time they exit (i.e., grade 3). Therefore, as a school district determines the staff for the primary grades at an elementary school, the school district will add the total number of students in the primary grades as a whole and then divide by a maximum of 24 (number can be lower based on district choice in the allocation formula) to get the number of teacher positions. For elementary schools that have determined that they will have a graded primary program, this may mean that one grade may have more than 24 students per classroom teacher and another grade may have less than 24 students per classroom teacher.

In the second case, when this statute was enacted, most secondary schools operated on a six-period day. Scheduling concepts such as alternative models and block schedules were not factored into legislation. Once the base level funding language is added into the staffing allocation formula, class size loads for middle and secondary school classroom teachers cannot exceed the equivalent of 150 pupil hours per day. This means that each classroom teacher who is allocated to grades 7-12 cannot have more than 150 per-pupil hours. One-hundred-fifty per-pupil hours of instruction during a six-hour school day would yield a ratio of 25:1.

# PROCEDURE FOR ENSURING PROMPT RESOLUTION OF COMPLAINTS OF VIOLATIONS OF 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).
   - The signature of the complainant. (See 34 C.F.R. §299.12.) https://www.gpo.gov/fdsys/pkg/CFR-2011-title34-vol1/pdf/CFR-2011-title34-vol1-sec299-11.pdf
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).

# FINANCIAL INFORMATION ALLOCATION PROCEDURE FOR TITLE I, PART A

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

# AMENDMENT GUIDELINES FOR DISTRICT PLANS

Even though an extensive planning process has been used, there may be occasions when changes to the school or district plan are required to meet unexpected needs. There are some situations when an **amendment** is required:

- An amendment is required to open an object code series once a program budget has been approved in writing or electronically by the state or federal program staff in the Kentucky Department of Education. There is no limitation on over-expending in an approved object code series as long as the total allocation is not exceeded. The expenditure report may reflect over-expenditures and under-expenditures in individual object codes.
- An amendment is required to purchase equipment that costs $5,000 or more per unit after the initial budget has been submitted and approved. This is not a change in inventory procedures. Inventory procedures must follow state guidelines unless the federal guidelines are more restrictive.
- An amendment is required when there is a need for a major or substantial change to the action plan; i.e., changing a priority or goal, changing the focus of an objective or strategy, and/or significantly expanding or deleting important services to children as described in the action plan.

The local district superintendent or his/her designee submits amendments via email to the Kentucky Department of Education program contact. Results of the amendment review by Kentucky Department of Education program staff are completed within ten working days and the district is notified by email.

The process for a district to submit an amendment via **email** to the Kentucky Department of Education is described below:

1. Set up a folder in email of the superintendent or designee for "Approved Amendments".
2. Only the superintendent or designee may submit amendments to KDE.
3. Choose *Becky Stoddard*, the KDE email contact from the KDE Global Address List for the *To* line in the email. mailto:thelma.hawkins@education.ky.gov
4. Copy the email to the district finance officer and the appropriate program coordinator as well as any other appropriate persons in the district.
5. In the *Subject* line of the email, type "*Plan Amendment.*"
6. In the Message box of the email, enter the MUNIS project number and the name of the affected program. Also, include the fiscal year affected by the amendment. For example, enter "Project # *310*, Title I, Part A Budget Amendment for FY2016*." (It is very important to enter the Project #.)
7. Enter the following required information in the Message box of the email:
    a. Reasons for the Amendment: Give a brief reason for the amendment. For example, type in, "*Open code 0530 to pay postage for parent involvement activities because the 500 series was not already open*.") **An amendment is only needed if the code series was not already open.**

b. Requested Amendment: Set up the amendment to show where funds are added (Increase) and to show where funds are taken from (Decrease). The example at the end shows how to set up the amendment. The total of the "Increase" column must equal the total of the "Decrease" column.

c. Equipment Exhibit: A budgetary amendment is required to purchase equipment that costs $5,000 or more per unit if not previously approved. In the Message box, include the following exhibit information: Equipment Item, Unit Cost, Number of Items, Total Cost, Location (Name of School, Office), and Justification for the Purchase.

1. Email the amendment to the KDE contact (Becky Stoddard). The contact will forward the email amendment to the appropriate program staff for review.
2. There are two possible review classifications: "Approved" or "Sent Back for Revision." If the amendment is "Sent Back for Revision", the district has two choices: (a) Edit the original amendment and resubmit to KDE by email; or (b) Delete the original amendment. If the amendment is **not** needed because the code series is already open, the amendment will be returned for you to delete from your email.
3. As soon as the amendment has been reviewed, the program staff will email the amendment back to the contact in the Division of Budgets. The contact will then forward the amendment (with the results of the review) to the local district superintendent or designee.
4. After the amendment has been approved, the appropriate MUNIS program budget must be updated to reflect the changes in the approved amendment. The next MUNIS expenditure report is required to reflect the changes.
5. The email message sent back with approval for the amendment should be moved to the Plan Amendment folder by the superintendent or designee for the record.

**Example of the content of an amendment sent to KDE via email:**

From: Name of Superintendent or Designee

To: Becky Stoddard (KDE Contact – Global Address List)

Cc: Name of District Finance Officer, Name of District Program Coordinator and any other appropriate persons in the district

Subject: Plan Amendment

Project #310, Title I, Part A Budget Amendment for FY20XX

Reason: Open code 0530 to pay postage for parent involvement activities

because the 500 series was not already open.

INCREASE

| | |
|---|---|
| 0530 – Postage | $1,000 |
| TOTAL | $1,000 |

DECREASE

| | |
|---|---|
| 0610 – Supplies | $500 |
| 0640 – Books/Periodicals | $500 |
| TOTAL | $1,000 |

# 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 to the district level. Keep in mind that every district in Kentucky is competing with every district across the nation for money out of the national Title I, Part A appropriation. Kentucky's allocation is the aggregate of all of the allocations to districts in Kentucky.

## 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. The number of census poverty children, children in locally operated neglected institutions, and foster children counted in the formula cannot be changed by the Kentucky Department of Education, and they cannot be changed by the U.S. Department of Education. 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 is 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 state's 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% 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% 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% of its previous year's allocation if 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. 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

Kentucky's approved NCLB waiver allows districts to transfer up to 100% of funds from the following programs into Title I, Part A: Title II, Part A, and Title II, Part D. Funds may not be transferred out of Title I, Part A into other programs. Funds cannot be transferred across years; for example 2015-16 funds from applicable programs cannot be transferred to 2016-17 Title I funds.

1. 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 statutory set-asides governing a district's use of funds. However, Kentucky's approved NCLB waiver allows a district to exclude funds transferred into Title I, Part A from the calculation of these set-asides.

2. 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.

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

   Before transferring funds, a district must –
   a. Conduct consultations in accordance with section 9501 of the ESEA in order to provide for the equitable participation of private school students and staff;
   b. Determine the program(s) from which funds are to be transferred and to which funds will be transferred;
   c. Determine the amount, and Federal fiscal year, of funds to be transferred by fiscal year;
   d. Establish the effective date for the transfer; and
   e. As appropriate, modify each affected local plan or application to reflect the transfer.

4. My district has been identified as a focus or priority district. Can I transfer funds?

   Yes. Transfer restrictions based on improvement status have been lifted as part of Kentucky's approved NCLB waiver.

5. 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 I 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 310* | 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 Revenue | | 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 |

6. 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.

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

   According to Kentucky's approved NCLB waiver, equitable services requirements for private school students, parents, and teachers must be met for each fund transferred prior to adding them to the Title I, Part A allocation.

8. Do I need to notify KDE 30 days prior to making a transfer?

   According to Kentucky's approved NCLB waiver, notification provided to KDE 30 days prior to making a transfer is no longer required.

9. Whom do I call if I have questions?

   You may call Division of Budgets 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 Act 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 NCLB of 2001 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% 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. (KDE Contact: becky.stoddard@education.ky.gov)
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 and submitted to Title1reports@education.ky.gov . 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 high poverty (40% 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. The district must document that Title I funds supplement (not replace) general funds by ensuring that the state staffing formula has been followed (i.e. the school has the required number of general funded staff/funding without counting staff funded through Title I). No distinctions are made between staff paid with Title I funds and staff who are not paid with Title I funds. The Title I funded staff do not have to be the ones delivering the services. All school staff is expected to direct their efforts toward upgrading the entire educational program and improving the achievement of all students, particularly those who are low achieving.

- **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.

**Supplement vs. Supplant Test**

May Title I funds be used in a targeted assistance program to pay for Title I students' participation in an extended- day kindergarten program?

**Yes**, if the Title I program is designed to extend the time that a Title I eligible student is in kindergarten. For example, the district provides morning instruction through State and local funds to all students, including Title I students. Students identified as most in academic need are then served in the afternoon through Title I funds by an appropriately licensed teacher. The teacher may be the same individual who teaches kindergarten in the LEA's regular kindergarten program, with Title I funding the second half of the teacher's day and salary. This model meets the supplement, not supplant test since the Title I students are receiving services above and beyond those provided by the LEA to all students.

# AVAILABILITY OF TITLE I. PART A FUNDS

NCLB Title I, Part A, Section 1127

**The following information applies to regular Title I, Part A Funds only 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.

## WAIVERS FOR 15% CARRYOVER REQUIREMENTS

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% 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 SY 2016-17 allocations.

**FY 2017 Appropriation**
**(Title I, Part A Funds Allocated to the LEA from Funds Made Available on July 1, 2016 Total $1,500,000)**

| | |
|---|---|
| Total allocation | $1,500,000 |
| Minimum amount district must obligate between July 1, 2016 – September 30, 2017 to avoid excess carryover (85% of total appropriation) | 1,275,000 |
| Amount district may carryover and obligate during October 1, 2017 – September 30, 2018 (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, 2017, obligate at least $1,275,000 (85%) of the total allocated to it. The district may carry over a maximum of $225,000 (15%) into the next fiscal year and must obligate those funds by September 30, 2018.

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.
4. Funds that must be reserved for specific requirements (parent involvement ) that are carried over must still be used for these requirements.

## 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 is 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. A 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. (KDE Contact: mailto:thelma.hawkins@education.ky.gov
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 draw downs 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

The Federal Cash Request System (FCR) is designed to allow school districts or educational cooperatives to submit requests for reimbursement of expenditures. Each fiscal year before any payments can be made to the recipients KDE posts the district award notification on the website and the KDE Grants Manager provides the Accounting Analysts with a list of approved allocations for each district by grant program.

Districts must complete their District Funding Assurances, Federal Cash Statement of Assurance, and have their Superintendent send an email to the GMAP System prior to requesting any New Year funds. Educational Cooperatives only need to complete the Federal Cash Statement of Assurance and email it to the fcr.requests@education.ky.gov inbox. Districts/Educational Cooperatives can still request old year funds if their GMAP information isn't completed at the beginning of the New Year.

Federal Cash Requests can be made at any time. To initiate a payment, the school district/educational cooperative completes a Federal Cash Request Form and submits it to the Division of Budget and Financial Management, Accounting Branch in the fcr.requests@education.ky.gov inbox. The form requires the following fields for each program to be completed by the school district or cooperative: district name, reimbursement for actual expenditures through, cash advanced for next 30 days dates (if necessary), approved budget, actual expenditures to date, cash advance amount (if necessary), previous cash received, request this period, and balance to be requested. The form must include an electronic approval signature of the appropriate person (superintendent, finance officer, program coordinator) in the school district or cooperative, their title, and the date the form was completed.

Upon receipt of the request the accounting analyst in the Division of Budget and Financial Management, Accounting Branch, reviews the request to make sure it complies with established FCR guidelines. Once a payment is processed it will be sent directly to the school district or cooperative from the Kentucky State Treasurer's office via check or eft.

## 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) 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 x 2.20% LEA's Restricted Indirect Cost Rate = $5,300 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 regardless of the district's threshold 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 0738 for equipment regardless of cost. Use MUNIS object codes 0645 for audio-visuals and 065 for computer software that is below $5000. Use MUNIS object code 0735 for computer software more than $5000 per unit.
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 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.
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 = | 0.9 X $1,704 = 1,534 |
| Portion of Benefit Paid by Title I = | 0.1 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.

**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 2016-17 school year (MUNIS Function Code 2600): $259,550

2. Number of classrooms and classroom equivalents used at each school during the 2016-17 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 2016-17 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 $5,000 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).

# DISTRICT REQUIREMENTS FOR TRACKING TITLE I, PART A SPENDING REQUIREMENTS

Under the No Child Left Behind Act (NCLB), districts are required to track certain Title I, Part A expenditures.

- **Parent Involvement** – *Applies to all districts that receive* a district Title I allocation exceeding $500,000. Districts must spend 1% of the district's Title I allocation to meet parent involvement requirements.

The requirement for tracking has applied to Title I funds since the FY2006-07. Each district continues to receive a single Title I, Part A (310*) allocation from the state. It will then be up to the district to create a budget Parent Involvement (310*M). Each of these sub-projects uses the Title I, Part A (310*) funding matrix.

| Requirement | Description | Funding Sources | Project Number |
|---|---|---|---|
| Parent Involvement<br>PROJECT NUMBER: 310*M<br>ORG Key code 797;<br>Components are:<br>Type = E; Fund #; Unit = ###; Function 2191; Program 000 (new-Title I Parent Involvement); IL ##; Description Title I Parent Involvement; 10 Char T I PAR INV; basic | District (with an allocation exceeding $500,000) must spend 1% of the district's Title I allocation to meet parent involvement requirements. 95% of the 1% must be distributed to Title I schools. | Title I, Part A (310*M) only must be used to meet the 1% for parent involvement in districts with allocations exceeding $500,000. | 310*M<br>(See org under requirements) |

# PERSONNEL PAID FROM TITLE I

OMB Circular A-87

Payroll records must document the staff at the district and school level paid completely or partially from Title I funds.

## Personnel Working With One Program

- District personnel whose salary is paid in whole from Title I funds must certify, on a semiannual basis (twice a year), that he/she worked solely on that program for the period covered.
- The certification must indicate the period covered by the certification and must be signed by the employee and the supervisor who has first-hand knowledge of the work performed.

| **This certifies that the employee has worked solely with Title I for (period covered by certification)** | |
|---|---|
| Employee Signature: | Supervisor Signature: |

## Personnel Working With More Than One Program

- District personnel working with more than one federal program (or combination of federal and nonfederal programs) must maintain monthly Personal Activity Reports (PAR) of the number of hours the employee worked directly with Title I and other duties. The report must reflect an "after-the-fact distribution" of the employee's actual activity and must account for the percentage of time for which the employee is paid from each program.
- The monthly activity report must be signed by the employee and supervisor who has first-hand knowledge of the work performed.
- School personnel in a targeted assistance school partially funded with Title I funds must have a schedule (or a PAR). The schedule should specify the amount of time working directly with the Title I program and should include "non-instructional" duties. A schedule or PAR is not required for school personnel in a schoolwide program who are partially funded with Title I funds if the school is consolidating its Part A funds with other funds.

| **PERSONAL ACTIVITY REPORT (PAR)**<br>**for District Personnel Working with More than 1 Program** | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Employee Name: | | | | | Month: | | | | |
| Reporting Period | PROGRAM | PROGRAM | PROGRAM | TOTAL HRS PER DAY | Reporting Period | PROGRAM | PROGRAM | PROGRAM | TOTAL HRS PER DAY |
| 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 certifies that the employee has completed work during the time period for the federal programs as indicated. | | | | | | | | | |
| 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 $50,000 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.*

# Appendix

## Appendix A – ANNUAL PARENT INVOLVEMENT EVALUATION (1)

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 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. Thank you for your valuable input.

| | YES | NO |
|---|---|---|
| 1. For TAS Were you notified when your child was chosen for Title I services?<br>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 regarding 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) | |

## Appendix B – ANNUAL PARENT INVOLVEMENT EVALUATION (2)

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:

| | YES | NO |
|---|---|---|
| 1. I have been invited to attend training to help my child succeed in school. | | |
| 2. I am aware 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 to achieve these goals. | | |
| 6. I have the opportunity to give input regarding school policies. | | |
| 7. I was notified of the meeting to evaluate the school's Parent Involvement Policy. | | |
| 8. My child felt comfortable about attending this school. | | |
| 9. Meetings were held at a convenient time of the day. | | |
| 10. Working in the science lab has helped improve my child's understanding of science. | | |
| 11. Materials sent home were easy to follow and easy to understand. | | |
| 12. I was kept well informed of the activities at the school. | | |
| 13. I felt comfortable and welcome in the school. | | |
| 14. I felt comfortable volunteering at the school. | | |
| 15. I received clear information regarding my child's academic progress. | | |
| 16. Opportunity has been provided for parents to communicate with principals and other administrative staff. | | |

My child has benefited from the help of Mr./Ms._____.

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.

## Appendix C – END OF YEAR TITLE I SURVEY FOR PRIVATE SCHOOL TEACHERS

Please customize the letter with district letterhead. Personalize to district specific information.

**Date**

The Title I teachers need input from you, the private school teachers, regarding the effectiveness of the Title I services provided to your students. Your comments and suggestions are greatly appreciated and will help with future planning.

1. What is your homeroom grade?

2. How many students in your homeroom participated in the Title I program?

3. In what subjects did your students participate?

   ____Reading _____Mathematics _____Both reading and Mathematics

4. Have your Title I students improved their reading and mathematics skills, as well as attained academic achievement standards?

   _____Both skills improved and standards met
   _____Only skills improved
   _____Neither skills improved nor standards were met

| Comments: |
|---|
| |

5. Has this program helped your students improve their view of reading and mathematics in your classroom? (Put R for reading, M for mathematics, and B for both on the applicable response line.)

   _____Very much _____Not at all
   _____Somewhat _____Unable to determine

| Comments: |
|---|
| |

6. What features of the Title I program did your students seem to enjoy?
   _____Getting more help for reading or mathematics, or both
   _____Learning more easily, because there are fewer students in the class
   _____Participating in a variety of activities

_____Having time away from the regular classroom

| Other: |
| --- |
| |

7. Have the parents of your students asked you about the Title I program?

   _____Yes _____No

8. Which subject area should receive priority in providing Title I instruction to academically at-risk students if the school district could only fund one area?

   _____Reading _____Mathematics

9. In your opinion, what is the strongest feature of the Title I program?

   _____Extra support for improving reading, or mathematics, or both subjects
   _____Single subject (reading or mathematics) focus
   _____Small group instruction

| Other, please explain: |
| --- |
| |

10. How were you kept informed about your students' progress in the Title I program?

    _____In-person conference(s) with the Title I teacher
    _____Weekly coordination with the Title I teacher
    _____Sharing of progress reports by the Title I teacher
    _____Other communication (notes, letters, comments on students' work)

| Comments: |
| --- |
| |

Please share any other comments regarding how Title I services can be improved.

| |
| --- |
| |

PLEASE RETURN THIS SURVEY TO THE SCHOOL OFFICE NO LATER THAN **date**

Thank you very much for your comments and suggestions.

# Appendix D – MEMORANDUM TO PRIVATE SCHOOLS

Please customize the letter with district letterhead. Personalize to district specific information.

**Memorandum**

To: Private School Teachers of Title I Students

From: **Name**, Title I Coordinator

Date: **date**

Subject: Title I Program Parent Survey

Enclosed are parent survey forms for the Title I program. Thank you for your input and suggestions during the drafting stage. Please distribute these to your students who are Title I participants and ask that they give it to their parents. The parents should return the surveys to you as soon as possible, but no later than **date**. If forms are returned to you later than this date, please accept them as well. However, any encouragement to have the forms returned as soon as possible will be appreciated. Please send returned forms to the school office each day.

Thank you for your help. The input from these surveys will help us to best meet the needs of your Title I participants.

Please contact me at **phone number** if you have any questions.

# Appendix E – LETTER OF NOTIFICATION TO PRIVATE SCHOOLS

Please customize the letter with district letterhead. Personalize to district specific information.

**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 envelope 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**

# Appendix F – TITLE I PROGRAM PARENT SURVEY (1)

Please customize the letter with district letterhead. Personalize to include district specific or additional information.

**date**

To better serve the students of our school, we would like your opinion about your child's experience in the Title I program. Your time, comments, and suggestions are greatly appreciated!

1. My child attends _____School.

2. My child is in grade _____ during the current school year.

3. My child receives Title I supplemental instruction in:

   _____Reading_____Mathematics _____Both reading and mathematics

4. The Title I program helped improve your child's skills in

   Reading _____Yes _____No

   Mathematics _____Yes _____No

   Comments_____

5. What does your child like about the Title I program? (Check all that apply)

   _____Getting more help with reading and/or mathematics
   _____Learning more easily because there are fewer students in the class
   _____Participating in a variety of activities
   _____Having time away from the regular classroom
   _____Other (Explain) _____

   Comments_____

6. What does your child dislike about the Title I program? (Check all that apply)

   _____Having to do additional work
   _____Missing regular classroom work
   _____Leaving the classroom
   _____Other (Explain) _____

   Comments_____

7. In your opinion, what is the best feature of the Title I program?

   _____Extra support for improving reading, mathematics or both

_____Single subject (reading or mathematics) focus
_____Small group instruction

Recommended improvements_____

8. How did the Title I teacher keep you informed of your child's progress in the Title I program? (Check all that apply.)

   _____In-person conference(s)
   _____Telephone conversation(s)
   _____Progress report(s)
   _____Parent-teacher meeting (s) at school
   _____Other written communication (notes, letters, comments on student work)
   _____I was not informed.

   Comments_____

9. Which of these strategies would you use to help your child practice reading, mathematics, or both at home? (Check all that apply.)

   _____Take home books from school
   _____Take home video cassettes with activity books
   _____Take home activities to do on a computer
   _____Attend parent involvement meetings or workshops at school
   _____Volunteer in the Title I program to observe the Title I teacher's methods

   Comments_____

10. When would you most likely be able to attend a parent-teacher meeting at school? (The times below are approximate and would coincide with the school schedule.)

    _____At the beginning of the school day
    _____Around lunchtime
    _____In the afternoon, before the end of the school day
    _____In the afternoon, at the end of the school day
    _____Early evening
    _____Weekend

    Comments_____

Please return this survey to your child's classroom teacher as soon as possible, but no later than **date**. Thank you for helping us to improve the next year's Title I program.

# Appendix G – TITLE I PROGRAM PARENT SURVEY (2)

Please customize the letter with district letterhead. Personalize to district specific information.

**date**

Dear Parent/Guardian:

We would like your comments on the Title I program in your child's school. When you have completed this form, simply seal it in the envelope provided and return it to your child's Title I teacher by [insert date]. Thank you!

**Title I Teacher**

Title I Program
Parent Survey
**School Year**

School my child attends: _____
Grade: _____

Directions: Please circle one answer for each statement below.

| | | | | |
|---|---|---|---|---|
| The Title I program has helped my child gain confidence. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| I was given information on my child's progress. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| My child is doing better in reading since attending the Title I program. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| My child is doing better in math since attending the Title I program. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| My child enjoyed participating in the Title I program. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| Overall I was satisfied with the Title I program. | Strongly Agree | Agree | Disagree | Strongly Disagree |

Please share any comments you may have about the Title I program for your child.

# Appendix H – 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.

## 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.