

The background of the slide is a composite image. The top-left portion shows a line of yellow school buses, with the word 'SCHOOL BUS' visible on the front of the lead bus. The bottom-right portion shows a classroom with blue walls, decorated with colorful balloons and framed pictures. Several desks and chairs are arranged in the room.

Title I, Part A Basics

New Coordinator Training



Kentucky Department of
EDUCATION

Topics

- Purpose of Title I
- Allocations
- Applying for funds
- Fiscal responsibilities
- Program Requirements
- Monitoring

New coordinator training webinar

- The information in this presentation is covered in the New Coordinator Training webinar. Use the following timestamps to navigate to a specific topic:
 - Allocations 9:23
 - Applying for Funds 21:46
 - Fiscal Responsibilities 51:02
 - Program Requirements 59:00
 - Monitoring 1:06:29

Program Purpose

Purpose

- Title I, Part A (Improving Basic Programs) is one of the largest federal programs supporting elementary and secondary education. These supplemental resources help ensure that:
 - All children have a fair, equal and significant opportunity to obtain a high-quality education;
 - Support and resources are provided to achieve proficiency on challenging state academic achievement standards and assessments;
 - Resources are targeted to districts and schools in the greatest need.
- Title I, Part A is part of the Elementary and Secondary Education Act (ESEA) of 1965 and was most recently reauthorized by the Every Student Succeeds Act (ESSA) of 2015.

School-based program

- Title I, Part A is meant to be a school-based program so that schools can make decisions about what services will most influence student outcomes.
 - The majority of Title I funds should be allocated to participating schools.
- Consultation between the district and its schools is required during the development of the Title I application and the implementation and evaluation of the program.
 - Consultation is ongoing.
 - Ongoing consultation allows the district and schools to adjust programs as necessary.

Title I coordinator responsibilities

- Oversight of entire program:
 - Ongoing consultation with public and private/home schools
 - Program implementation management and evaluation at district and public and private schools
 - Compliance with federal statutes and regulations (allowability of costs, parent and family engagement, stakeholder collaboration, etc.)
 - Internal collaboration (finance staff, homeless coordinator, principals, superintendent, etc.)
 - Maintaining program documentation and internal controls
 - Completing the application in the Grant Management Application and Planning (GMAP) system

Guiding questions for collaboration

- Who do you collaborate with?
- How often?
- What topics are addressed?
- What methods (committees, councils, meetings, etc.)?
- How are we documenting our collaboration (written process, detailed meeting minutes, etc.)?

Documented processes and procedures are essential for program compliance

- Policy, process or procedure – What’s the difference?
 - **Policy** – A course or principle of action.
 - **Process** – A high-level operation spanning the organization which consists of the various functions necessary to accomplish a specific task.
 - **Procedure** – An established way of doing something which outlines the order of specific steps required to achieve an end result.
- Documenting processes and procedures helps provide transparency and internal controls.
- Clearly written procedures can help during staff changes and transitions.

Allocations

Formula children

- Estimates of the number and percentage of *formula children* in each district are used by the U.S. Department of Education (USED) in determining Title I, Part A allocations.
 - Based on poverty and population estimates provided by the U.S. Census Bureau
 - Do not reflect enrollment numbers or free and reduced lunch numbers
 - Cannot be compared to data gathered by the local education agency (LEA) or the Kentucky Department of Education (KDE).

Formula children defined

- Children ages 5-17 residing in the geographic boundaries of the school district from families below the poverty level identified by census data compiled by the U.S. Department of Commerce.
- 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.
 - 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 KDE to USED.
 - Number of children who reside in an institution for neglected children for at least 30 consecutive days, at least one day of which was in the month of October.

Funding sources

- Title I-A allocations consist of four different grants, each with separate eligibility criteria. *Note: A “formula child” is between the ages of 5 and 17 living in poverty.*
 - **Basic Grants:** The number of formula children must be at least 10 and more than 2% of the total number of children aged 5-17.
 - **Concentration Grants:** the number of formula children within the district must exceed either 6,500 or 15% of the total number of children aged 5-17. To qualify for this funding source, an LEA must meet the eligibility criteria in the current year or have met the criteria at least once in the four years prior to the current year. Because falling out of eligibility for this funding source can greatly affect your total allocation, KDE will contact you if this applies.
 - **Targeted Grants:** The number of formula children must be at least 10 and at least 5% of the total number of children aged 5-17.
 - **Education Finance Incentive Grants:** The number of formula children must be at least 10 and at least 5% of the total number of children aged 5-17.

Determining allocations

- Using Census Bureau estimates of children aged 5-17 and aged 5-17 in poverty, the USED determines base allocations.
- Base allocations are ratably reduced to make up the state's administration and school improvement funds.
- No district is reduced below its hold-harmless level, provided adequate funds have been appropriated by Congress.

Hold harmless

- The “rock bottom” dollar amount a district may receive in any fiscal year.
- Variable
- Based on last year’s allocation:
 - 95% if the census poverty percentage is 30% or greater;
 - 90% if the census poverty percentage is between 15% and 30%; or
 - 85% if the census poverty percentage is below 15%.

Hold harmless notification

Name of LEA	Tentative SY 2023-2024 Formula Children	Tentative SY 2023-2024 5-17 Population	Tentative SY 2023-2024 Percent Poverty	Tentative Hold Harmless Percentages for SY 2023-2024
District A	752	2,826	26.61%	90%
District B	468	3,957	11.83%	85%
District C	909	2,304	39.45%	95%
District D	6,881	48,051	14.32%	85%
District E	1,705	4,666	36.54%	95%
District F	2,123	9,068	23.41%	90%

Hold Harmless Rates

- 95% if the poverty percentage is 30% or greater
- 90% if the poverty percentage is between 15% and 30%
- 85% if the poverty percentage is below 15%

Hold harmless example

- A district's current allocation is \$1,000,000. It qualifies for all the funding sources for the Title I allocation. KDE issues tentative census numbers the following winter, which states the district's poverty percentage is 31%.
 - What will the district's hold harmless percentage and rock bottom allocation be for the next year?
 - Hold harmless is 95% if the census poverty percentage is 30% or greater
 - $\$1,000,000 \times 95\% = \$950,000$
 - How would you use this information in your district?

Typical allocation timeline

- **Spring**: Tentative allocations are released. At this point, not all census data is final. A tentative GMAP application is completed.
 - Districts cannot draw down available funds until the tentative application has received KDE approval.
- **Late Spring/Early Summer**: A “final” allocation with updated census data is released. KDE calculates allocations, but does not release to districts at this point, unless there are major changes.
- **Early October**: The “real final” is released. KDE calculates and issues this final to districts. GMAP revisions are required.
 - Final amounts are not uploaded into GMAP until the district has received KDE approval on the tentative application.

Applying for Funds

Application for funds

- The Title I, Part A application is housed in the GMAP system.
- There are many other program applications and application supplements in GMAP.
- The Title I, Part A application is completed by the coordinator and reviewed by the district finance officer and superintendent prior to submitting it to KDE for approval.
- The application must be approved by KDE in order for the district to draw down funds.

District set asides

- Set asides are funds that are reserved at the district level.
 - In some cases, districts are required to reserve funds for certain activities under Title I, Part A; in other cases, reservations are discretionary.
- Be mindful when taking optional set-asides.
 - Are the funds being used primarily at the central office, used to fund a districtwide activity or for some other purpose?
 - Funds being spent primarily at the school level must come from the school's allocation.
- Reference the Kentucky Department of Education (KDE) [Guidance for Districts on Title I, Part A Set-Asides](#) for additional information.

Homeless set aside

- All districts must reserve funds to provide comparable supplemental services to homeless students at Title I and non-Title I schools.
- The application narrative must contain a methodology documenting how the district determined the amount to reserve.
- **The majority of homeless set aside funds should be spent during the year in which they are reserved. Any unspent funds carried over to the next year must be spent on students experiencing homelessness.**
 - Please see the National Center for Homeless Education's [Serving Students Experiencing Homelessness under Title I, Part A](#) for example expenditures.
- Districts receiving the competitive McKinney-Vento grant are required to reserve a specific amount in addition to the homeless set-aside to supplement services provided to students experiencing homelessness.

Examples of homeless expenditures

- Funds may be used for services that help homeless students succeed in their overall school experience.
 - For example: tutoring and other academic supports, comprehensive services (mental health, medical services), technology supports (computers/tablets, provide Wi-Fi), sports uniforms and other needed supports
 - Mandatory fees outlined in [702 KAR 3:220](#) cannot be paid for with federal funds.
- You may collaborate with the director of pupil personnel (DPP), school administrators, school enrollment clerks, bus drivers, other federal program coordinators and others.

Neglected set aside

- Districts with locally-operated neglected institutions must reserve a reasonable and necessary amount to provide supplemental services to children in these institutions. Example expenditures may include:
 - Tutors
 - Counseling/peer mediation services
 - Computers and software
 - Books and materials
- Conducting a needs assessment jointly with the facility point of contact will help the district determine an appropriate amount to reserve.

Parent and family engagement set aside

- Districts receiving allocations larger than \$500,000 are required to reserve at least 1% of the total allocation for parent and family engagement.
 - The GMAP system automatically calculates the 1% reservation for all districts.
 - The amount can be increased.
 - Districts receiving allocations under \$500,000 may decrease/remove the set-aside funds.
- At least 90% of the required 1% reservation must be distributed to participating schools.
- **Parent and family engagement requirements must be met by all districts, including those not required to reserve funds.**

Discretionary set aside categories

- Foster Care
- Locally-Operated Delinquent Institutions
- Professional Development
- School Extension Programs
- English Learners
- Assessments
- Administrative Costs
- Substitute Salaries
- Sick Pay for Retiring Title I Funded Staff
- Variations in Personnel Costs

Ranking schools by poverty percentage

- LEAs have the discretion to choose which poverty factors are used to rank and serve schools and distribute funds.
 - Free and Reduced Lunch (FRPL) data and/or household income survey
 - Direct certification (students automatically eligible for free meals)
 - Temporary Assistance for Needy Families (TANF)
 - Medicaid
 - U.S. Census
 - Community Eligibility Provision (CEP)
- Must use the same poverty factors for all schools within the district
 - Exception for districts with a mixture of CEP and non-CEP schools.

Methods of qualification

- Districts select the parameters used to determine which schools are eligible to receive an allocation.
 - **35% Rule:** Any school at or above 35% poverty is eligible to receive an allocation.
 - **District Poverty Average:** Any school at or above the district's poverty average is eligible to receive an allocation.
 - **Grade Span Poverty Average:** Any school at or above the grade span poverty average is eligible to receive an allocation
- Methods of qualification determine a school's eligibility. Methods of allocation of funds determine how funds are distributed.

35% rule

Building Name	District ID - School Number	Grade Span	Service	Enrollment (K-12)	Poverty Factor	Low Income Students (K-12)				
						Public Number	Adjusted Public Number	Participating Private Number	Percent	Adjusted Percent
Martin Luther King Jr. Elementary School	115-017	PK-06	Schoolwide Program	678	FRPL (Free and Reduced Lunch)	539	539.00	5	79.50 %	79.50 %
Freedom Elementary	115-026	PK-6	Schoolwide Program	697	FRPL (Free and Reduced Lunch)	549	549.00	2	78.77 %	78.77 %
Indian Hills Elementary School	115-055	PK-06	Schoolwide Program	505	FRPL (Free and Reduced Lunch)	372	372.00	6	73.66 %	73.66 %
Christian County Middle School	115-035	7-8	Schoolwide Program	702	FRPL (Free and Reduced Lunch)	484	484.00	0	68.95 %	68.95 %
Hopkinsville Middle School	115-058	07-08	Schoolwide Program	548	FRPL (Free and Reduced Lunch)	358	358.00	9	65.33 %	65.33 %
Pembroke Elementary School	115-130	KG-05	Schoolwide Program	742	FRPL (Free and Reduced Lunch)	480	480.00	0	64.69 %	64.69 %
Sinking Fork Elementary School	115-150	PK-06	Schoolwide Program	461	FRPL (Free and Reduced Lunch)	295	295.00	4	63.99 %	63.99 %
Crofton Elementary School	115-040	PK-06	Schoolwide Program	409	FRPL (Free and Reduced Lunch)	257	257.00	0	62.84 %	62.84 %
Christian County High School	115-030	9-UG	Schoolwide Program	1263	FRPL (Free and Reduced Lunch)	785	785.00	0	62.15 %	62.15 %
Hopkinsville High School	115-050	9-UG	Schoolwide Program	1093	FRPL (Free and Reduced Lunch)	635	635.00	2	58.10 %	58.10 %
Millbrooke Elementary School	115-125	PK-06	Schoolwide Program	736	FRPL (Free and Reduced Lunch)	411	411.00	6	55.84 %	55.84 %
South Christian Elementary School	115-170	PK-06	Schoolwide Program	702	FRPL (Free and Reduced Lunch)	344	344.00	4	49.00 %	49.00 %
Bluegrass Learning Academy	115-100	06-12	Not a Title I School	0	FRPL (Free and Reduced Lunch)	0	0.00	0	0.00 %	0.00 %
Christian County Home/Hospital	115-998	PK-12	Not a Title I School	0	FRPL (Free and Reduced Lunch)	0	0.00	0	0.00 %	0.00 %
Cumberland Hall School	115-023	KGG-12	Not a Title I School	0	FRPL (Free and Reduced Lunch)	0	0.00	0	0.00 %	0.00 %
Totals:				8536		5509	5509.00	38	64.54 %	64.54 %

District poverty average

Building Name	District ID - School Number	Grade Span	Service	Enrollment (K-12)	Poverty Factor	Low Income Students (K-12)				
						Public Number	Adjusted Public	Participating Private	Percent	Adjusted Percent
Martin Luther King Jr. Elementary School	115-017	PK-06	Schoolwide Program	678	FRPL (Free and Reduced Lunch)	539	539.00	5	79.50 %	79.50 %
Freedom Elementary	115-026	PK-6	Schoolwide Program	697	FRPL (Free and Reduced Lunch)	549	549.00	2	78.77 %	78.77 %
Indian Hills Elementary School	115-055	PK-06	Schoolwide Program	505	FRPL (Free and Reduced Lunch)	372	372.00	6	73.66 %	73.66 %
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Christian County Home/Hospital	115-998	PK-12	Not a Title I School	0	FRPL (Free and Reduced Lunch)	0	0.00	0	0.00 %	0.00 %
Cumberland Hall School	115-023	KGG-12	Not a Title I School	0	FRPL (Free and Reduced Lunch)	0	0.00	0	0.00 %	0.00 %
Totals:				8536		5509	5509.00	38	64.54 %	64.54 %

Grade Span Poverty Average

Building Name	District ID - School Number	Grade Span	Service	Enrollment (K-12)	Poverty Factor	Low Income Students (K-12)				
						Public Number	Adjusted Public Number	Participating Private Number	Percent	Adjusted Percent
Martin Luther King Jr. Elementary School	115-017	PK-06	Schoolwide Program	678	FRPL (Free and Reduced Lunch)	539	539.00	5	79.50 %	79.50 %
Freedom Elementary	115-026	PK-6	Schoolwide Program	697	FRPL (Free and Reduced Lunch)	549	549.00	2	78.77 %	78.77 %
Indian Hills Elementary School	115-055	PK-06	Schoolwide Program	505	FRPL (Free and Reduced Lunch)	372	372.00	6	73.66 %	73.66 %
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Method of allocation of funds – rank and serve

- All schools above 75% must be served first in rank order.
- Schools below 75% must be served in rank order based on poverty.
 - **Districtwide Rank** – Schools are ranked by the district as a whole, straight down the poverty line from highest to lowest.
 - **Grade Span Rank** – May be used to prioritize serving one grade span over another. Within the grade span, schools must be served in rank order.
 - **Exception** – Districts with one school per grade span or under 1,000 students enrolled are exempt from rank and serve rules.
- Schools with a higher poverty rate must be served with an equal or greater per-pupil allocation.

Determining school allocations through per pupil amounts

- Funds are allocated to schools using a per pupil amount (PPA)
- The PPA is multiplied by the number of low-income students at each school to determine the school's allocation.
- Special rule (“the 125% rule”)
 - If an LEA serves any school with a poverty rate below 35%, the LEA must allocate to all of its schools a per-pupil amount (PPA) at least 125% of the LEA's allocation per low-income child.
 - In this case, the minimum PPA will be automatically calculated on the PPA List page in GMAP.

Districtwide rank versus grade span rank

School	Poverty Percentage	Districtwide Rank Example Per Pupil Amount	Grade Span Rank Example Per Pupil Amount
Elementary School A	79%	\$600	\$900
Middle School A	76%	\$598	\$850
Elementary School B	65%	\$550	\$800
High School A	62%	\$533	\$0
Middle School B	60%	\$515	\$0
Elementary School C	57%	\$450	\$750

GMAP and Enterprise ERP (EERP) alignment

- GMAP and EERP (formerly MUNIS) must align.
- Preplanning and collaboration with finance up front reduces burden.
- Statute and regulation
 - Grantees must follow their approved application ([34 CFR 76.700](#)).
 - Ensures funds are spent on allowable, approved activities and expenditures.
 - Ensures rank and serve rules are followed.
 - Helps to ensure compliance with all other requirements.

GMAP revisions

- Application revisions may be made at any point during the year through the GMAP system. An application revision would be required when:
 - Funds are reallocated;
 - A district moves Title I, Part A funds, which causes a change in the amount of a *district set-aside*;
 - A district moves Title I, Part A funds, which causes a change in the amount of a *school allocation*;
 - A district makes significant changes in the types of Title I, Part A activities it will carry out, for example, if a district was originally approved to carry out professional learning activities but desires to change that to parent and family engagement activities; or
 - There is misalignment between GMAP and EERP. It is highly recommended that districts develop a process to regularly align GMAP and EERP.

District Fiscal Responsibilities

Carryover limitation

- Title I has a 15% carryover limitation.
- Districts can carryover no more than 15% of a fiscal year's allocation into the next fiscal year as stated in ESSA 1127(a).
 - Have an initial period of 15 months to meet the limitation.
 - Example: July 1, 2023 - Sept. 30, 2024.
 - May request a carryover waiver once every three years.
 - Districts must strive to spend funds in a timely fashion with the goal to spend on current year students.
- [Title I, Part A Carryover Information](#) document

Comparability

- Districts must be able to show that services funded through state and local funds are comparable in all its schools.
- Comparability Report
 - Comparison of student/staff ratios or school to school salary comparisons.
 - Accounts for staff paid from state/local dollars.
- Exclusions:
 - Districts with only one school per grade span.
 - Districts not serving any schools in a particular grade span would not need to calculate comparability for that grade span.

Supplement, not supplant (SNS)

- Title I funds must be used to supplement funds that would be available from state and local sources, absent federal funds.
- Compliance
 - SNS methodology
 - Methodology must show the district distributes state/local dollars and services to all schools in a Title I-neutral fashion.
 - Include real calculations demonstrating how state/local dollars were distributed.

Supplement, not supplant methodology

- Methodology expectations
 - Must account for distribution of state and local funds, including staff, resources and services such as professional development, in a Title I-neutral manner.
 - Include all state and local funds that the district uses for the education of students.
 - Must reflect staffing and services allocations with real calculations and numbers to support it.
 - Based on the staffing allocation districts already provide to KDE.
 - Accompanying narrative to explain.
 - Must be supported with documentation (ESEA section 8306(a)(6)(B) and 34 C.F.R. §§76.730-76.731).
 - Must be on file at the district office and available for review by KDE in the event the district is monitored.

What to include in the SNS narrative

- Explain the staffing and funding sources that are included in the district's methodology.
- Explain how the funds were distributed. For example, if certain funds are allocated on a rotational basis or are combined and assigned through a per pupil amount, please explain.
- Explain which year's enrollment is being used in the calculations, if not clearly labeled.
- Affirm how the funds and staff were distributed according to the methodology.

SNS Methodology exclusions

- Issued in [USED guidance](#)
- There are exemptions under the following conditions:
 - One school district (the district would be exempt as a whole.);
 - A grade span with a single school (the single-school grade span would be exempt); or
 - Serves all schools with Title I allocations (the district would be exempt as a whole if every school is served. If all schools within a grade span are served, that grade span would be exempt).

Additional Program Requirements

Title I school programs

Targeted Assistance	Schoolwide
Services and resources must be targeted only toward students identified as most at-risk.	Services must be designed to help at-risk students but may also include whole school initiatives. The schoolwide plan describes services.
Only eligible students may participate in Title I-funded initiatives.	All students may participate in Title I-funded initiatives.
Use of funds must be consistent with specific Title I rules.	Use of funds must be consistent with specific Title I rules and schoolwide plan.
Only staff implementing the Title I program may participate in Title I funded professional learning opportunities.	All school staff are eligible to participate in Title I funded professional learning opportunities.
The school must implement parent and family engagement compact, policy and requirements for families of participating students.	The school must implement parent and family engagement compact, policy and requirements for all families.

Parent and family engagement (1)

- School and district parent and family engagement activities fall into two general categories:
 - Providing notice and information regarding the education of their children (right to participate, request teacher qualifications and the four-week notice); and
 - Implementing activities that engage parents and families in the school community and with their children's education.
 - Help parents support student success.
 - Tied to identified needs.
 - Not social/entertainment events.

Parent and family engagement (2)

- All districts and schools that accept funds have required activities that must be conducted with parents. For example, parents and families must:
 - Be consulted on the use of parent and family engagement funds;
 - Be involved in the development of the Title I program;
 - Be involved in the Title I program evaluation (school level);
 - Be involved in the development of the district- and school-level policies and school compacts.
- Parent and family engagement requirements must be met by all districts, including districts not required to reserve funds for this purpose.

Private school services (1)

- Title I, Part A has its own equitable services requirements.
 - Qualifying low-income students who attend a private school and would otherwise attend a participating Title I school generate **funds to provide equitable services** at the private school.
- Other programs equitable services requirements are covered in Title VIII of the ESSA.
- Why?
 - For Title I Part A, districts are required by statute to provide equitable services to students, parents and teachers of participating students in private schools within and outside the district's boundaries.
 - Other programs are required to provide services to private schools that are within their boundaries only.

Private school services (2)

- Services are required to:
 - Be proportionately funded off the top of the district's allocation;
 - Include an amount for parent and family engagement for families of participating students;
 - Target the lowest-achieving students;
 - Be designed and evaluated through ongoing consultation with private schools; and
 - Be fully overseen, both programmatically and fiscally, by the district.

District responsibilities

- Districts are responsible for
 - Notifying all private/home schools of the opportunity to participate in the Title I, Part A program
 - Conduct initial consultation with each participating private/home school to determine what services will be provided
 - Work with the [KDE Ombudsman](#) to ensure equitable services requirements for eligible private school children, teachers and other educational personnel, and families are met

Program Monitoring

Program monitoring requirement

- As the pass-through entity, KDE is required under [2 CFR 200.332\(d\)](#) to monitor the subrecipient (LEA) as necessary to ensure that the subaward is used for authorized purposes, in compliance with federal statutes, regulations and the terms and conditions of the subaward; and that the subaward performance goals are achieved.
- Monitoring ensures effectiveness and compliance at all levels.

Types of program monitoring

- Two types of Title I, Part A program monitoring
 - Desk monitoring
 - Consolidated monitoring
- Monitoring goals
 - Check for compliance
 - Provide technical assistance
 - Highlight strengths and best practices
- KDE's monitoring checklists should be used to evaluate district and school requirements. The checklists are available on the [Title I, Part A Documents and Resources](#) webpage.

Monitoring process

1. District notified a few months prior.
2. District uploads documentation to an online folder by assigned due date.
3. KDE reviews documentation and develops follow up questions to supplement monitoring checklists
4. KDE follow up.
 - a. Desk Review: Q&A via email and/or phone with district coordinator.
 - b. On Site: Interviews with coordinator, finance officer, foster care liaison, English learner coordinator, homeless coordinator, representatives from neglected facilities, principals of Title I-served schools; potential follow-up via email and phone after the visit.

Monitoring reports/Actions needed forms

- Title I, Part A actions needed form
 - Provided to all districts selected for Title I monitoring (desk and consolidated).
 - Contains strengths, recommendations and actionable items based on non-compliance as applicable.
- Consolidated monitoring report
 - Provided to all districts selected for consolidated monitoring.
 - Identifies cross-cutting effective practices and opportunities for improvement observed by program staff participating in monitoring.
 - Posted to KDE website.

Contact information

Erin Sudduth

Title I, Part A Support and
Improvement Branch Manager

502-564-3791

erin.sudduth@education.ky.gov

David Millanti

Division of School and Program
Improvement Assistant Director

502-564-3791

david.millanti@education.ky.gov

[Title I Consultant by District](#)