TITLE I, PART A HANDBOOK
2017-2018

KENTUCKY DEPARTMENT OF EDUCATION 300 Sower Blvd. Frankfort, Kentucky 40601

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TITLE I DISTRICT COORDINATOR SUPPORT

Tips for Title I Coordinators

1. Visit the Kentucky Department of Education (KDE) and US Department of Education (ED) Title I webpages at: KDE Title I, Part A and ED Title I, Part A.
2. Read your district's most recent Title I grant application and supporting materials (Title I Narrative, Needs Assessment, Budget, etc.). Supporting materials can be located in the Title I Annual Review and Comprehensive School Improvement Plan (CSIP).
3. Read the accountability data found in the School Report Card for your district and its schools for the most recent year.
4. Visit your Title I schools often. Become familiar with their needs assessment, improvement plans and procedures for student selection in a Targeted Assistance Program (TAS), method for providing services, and family engagement activities.
5. Visit any non-public schools that may be participating in the Title I program and any local institutions or homes receiving Title I funds for neglected and delinquent youth. Familiarize yourself with the services being provided by the district for those students.
6. Read your district's policies governing family engagement, data collection and use, professional development and the dissemination of annual notices to parents (e.g., School Report Cards and Parents' Right-to-Know).
7. Use the Title I Coordinator Year-at-a-Glance timeline in Appendix A as a guidance for your program.

Hints for Organization and Record Keeping

1. Set up your files using KDE's Consolidated Monitoring form as an organizational framework. Maintain current documents that will serve as evidence for each area should the district be monitored. See the list of suggested documentation at the end of each section.
2. Maintain updated lists of students served in TAS (if applicable), including criteria by which students were selected, date of entry into the program, date of exit and reason for exit (e.g., academic exit, moved, dropped by parent request, etc.)
3. Keep current copies of SWP and TAS plans on file at the district office.
4. Create a filing system to be used at all participating schools, this will help ensure that all schools are maintaining proper documentation and smooth the process of visiting each Title I school. Some coordinators provide each school coordinator with a portable file box, files pre-labeled with the necessary sections and tip sheets for each section as to what type of documents should be kept in each folder.
5. Maintain hard copies as well as digital copies of documents whenever possible. Give digital documents and folders titles that make it easy to determine what each item is.

Sample Documentation

When a district is monitored by KDE, documentation must be provided showing that the Title I program is being run effectively. Sample documentation lists can be found at the end of each section and the master list can be found in Appendix AA. These lists are not all-inclusive but rather suggestions of potential documentation. Contact a KDE Consultant to verify other allowable forms of documentation.

TITLE I, PART A, PROGRAM REQUIREMENTS

ESSA, Title I, Part A
Sections 1111, 1112, 1113, 1114, 1115, 1116, 1117, 1118, 1119

The purpose of this title is to provide all children with significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

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. There is an exception to the ranking rule; a district may lower the poverty threshold to 50% for high schools. Districts are not required to serve high schools above 50% poverty, it is optional. If a district elects to use the exception, all high schools above 50% poverty must be served.

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. See page 54 for more information on how Title I funds are used to serve children in neglected and delinquent institutions.

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 reserve "such funds as may be necessary" (see ESSA 1113(c)(3)(A)), to serve homeless children attending both Title I and non-Title I schools (regardless of receiving a McKinney-Vento Homeless Assistance Grant). Funds must be reserved even if all schools in the district are Title I schools. The reserved funds must address the educational needs of the homeless students and must take into account homeless students enrolled in private schools, institutions for neglected children, and local institutions for delinquent youths. See page 49 for more information on how Title I, Part A funds are used to serve homeless children and youth.

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. See page 31 for more information on how Title I, Part A funds are used to provide equitable services to private school children.

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. See page 41 for more information on how Title I, Part A funds are used to serve preschool programs.

7. **Parent and Family Engagement:** 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 and family engagement activities and must distribute 90% of that 1% to Title I schools. A proportionate amount of the 90% must be used for parent and family engagement for parents of participating private school students. A written parent and family engagement policy at the district level

must be developed jointly, agreed upon, and distributed to parents of participating children. The parent and family engagement policy must include:

- Overall expectations for parent and family engagement;
- Components for building capacity for more effective parent and family engagement; and
- An annual evaluation of the content and effectiveness of the parent and family engagement activities in increasing participation of parents and whether there are barriers to greater participation.

See page 23 for more information on how Title I, Part A funds are used to increase parent and family engagement.

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.

   See page 37 for more information on the role of paraeducators in Title I schools.

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, or take the place of, funds from non-federal sources. ESSA 1118(b)(2) changed the way that districts demonstrate compliance with the Supplement not Supplant requirement. The LEA must demonstrate the methodology in which state and local funds are distributed to schools. Funds must be distributed in a Title I-neutral manner; the LEA cannot determine the amount of state and local funds allocated to a school based on the school's Title I allocation.

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. Best practice is to maintain records for the current year and five (5) prior years.

SCHOOLWIDE PROGRAM REQUIREMENTS

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

This section should be used for assistance in establishing a schoolwide program in your local educational agency (LEA). You can also find guidance released by the U.S. Department of Education (ED) at the following links:

Schoolwide Program Non-Regulatory Guidance

Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program

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.

An LEA may operate a schoolwide program in a school with less than 40% poverty 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.

Schoolwide program checklist:
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).
Meets at least one of the following qualifications: 1. A Title I school with 40 percent or more of its students living in poverty, regardless of the grades it serves 2. A Tier I or Tier II school in a state that requested and received a waiver through the School Improvement Grant (SIG) program that received funds to implement one of the SIG intervention models. 3. A Title I school under 40% poverty that receives a state waiver (see note below) or was served the previous school year as a schoolwide program and the LEA wishes to continue services for a school that dipped below 40% poverty using the grandfather clause.

Note: The Kentucky Department of Education has the authority to allow a Title I school to operate a schoolwide program without meeting the 40 percent poverty threshold if it is determined that a schoolwide program will best serve the needs of students in the school who are failing, or at risk of failing, to meet the challenging state academic standards. (ESSA sections 1114(a)(1)(B) and (b)(6)). Please contact your Title I consultant for more information.

SCHOOLWIDE PROGRAM PLAN CORE COMPONENTS

There are three core components required by statute for effective implementation of a schoolwide program (SWP): conducting a comprehensive needs assessment, preparing a comprehensive schoolwide plan, and annually reviewing and revising, as necessary, the schoolwide plan. Each component must be described in the SWP plan.

COMPREHENSIVE NEEDS ASSESSMENT	
The goal of the needs assessment is to use academic data for the entire school and shareholder feedback to determine the subjects and skills for which teaching and learning need to be improved as well as gain a better understanding of the root causes of the identified needs. ESSA 1114(b)(6) requires each school operating an SWP develop a plan based on a comprehensive needs assessment and the specific functions of the needs assessment are outlined in 34 CFR 200.26(a).	
A school operating an SWP must conduct a comprehensive needs assessment of the entire school that –	34 CFR 200.26(a)(1)
• Is based on academic achievement information about all students in the school, including all groups under 34 CFR 200.13(b)(7) and migratory children [See ESSA 1309(3) for definition], relative to Kentucky's academic standards under 34 CFR 200.1 to – ○ Help the school understand the subjects and skills for which teaching and learning need to be improved; and ○ Identify the specific academic needs of students and groups of students who are not yet achieving Kentucky's academic standards; and • Assesses the needs of the school relative to each of the components of the SWP under 34 CFR 200.28.	200.26(a)(1)(i) 200.26(a)(1)(i)(A) 200.26(a)(1)(i)(B) 200.26(a)(1)(ii)
• The comprehensive needs assessment must be developed with the participation of individuals who will carry out the SWP plan. [See also ESSA 1114(b)(2)]	200.26(a)(2)
• The school must document how it conducted the needs assessment, the results it obtained, and the conclusions it drew from those results. [See also ESSA 1114(b)(3)]	200.26(a)(3)

COMPREHENSIVE SCHOOLWIDE PLAN	
The data gathered during the needs assessment is used to develop a plan describing how the school will improve academic achievement and address the identified needs throughout the school, but particularly for the lowest achieving students (ESSA 1114(b)(7)). A suggested list of activities to address need in an SWP can be found in ESSA 1114(b)(7)(A)(iii). The components of an SWP are found in 34 CFR 200.28.	
Schoolwide Reform Strategies	
The SWP must incorporate reform strategies in the overall instructional program. Those strategies must –	200.28(a)
• Provide opportunities for all students to meet Kentucky's proficient and advanced levels of student academic achievement.	200.28(a)(1)
• Address the needs of all students in the school, particularly low-achieving students and those at-risk of not meeting Kentucky's student academic achievement standards who are members of any target population of any program included in the SWP; and ○ Address how the school will determine if the needs have been met.	200.28(a)(2)(i) 200.28(a)(2)(ii)
• Use effective methods and instructional practices that are based on evidence-based research [See ESSA 8101(21) for definition], and that – ○ Strengthen the core academic program; ○ Provide an enriched and accelerated curriculum; ○ Increase the amount and quality of learning time, such as extended school year, before- and after-school and summer programs and opportunities; ○ Include strategies for meeting the educational needs of historically underserved populations; and	200.28(a)(3) 200.28(a)(3)(i) 200.28(a)(3)(ii) 200.28(a)(3)(iii) 200.28(a)(3(iv)

○ Are consistent with, and designed to implement, State and local improvement plans, if any.	200.28(a)(3)(v)
Instruction by Highly Qualified Teachers	
An SWP must ensure instruction by highly qualified [See ESSA 1111(g)(2)(J) for definition] teachers and provide ongoing professional development (PD). The SWP must –	200.28(b)
• Include strategies to attract highly qualified teachers;	200.28(b)(1)
• Provide high-quality and ongoing PD [See ESSA 8101(42) for definition] for teachers, principals, paraprofessionals and, if appropriate, pupil services personnel, parents, and other staff to enable all students to meet Kentucky's student achievement standards; • Align PD with Kentucky's academic standards;	200.28(b)(2)(i) 200.28(b)(2)(ii)
• Devote sufficient resources to carry out effectively the PD activities described in paragraph (b)(2) of this section; and	200.28(b)(3)
• Include teachers in PD activities regarding the use of academic assessments to enable them to provide information on, and to improve, the achievement of individual students and the overall instructional program.	200.28(b)(4)
Parent and Family Engagement (formerly parental involvement)	
An SWP must involve parents in the planning, review, and improvement of the SWP plan.	200.28(c)(1)
• An SWP must have a parent and family engagement policy, consistent with ESSA 1116(b) that – ○ Includes strategies, such as family literacy services, to increase parent and family engagement in accordance with ESSA sections 1116(c) through (f) and 8101(39); and ○ Describes how the school will provide individual student academic assessment results, including an interpretation of those results, to the parents of students who participate in the required academic assessments. [See 34 CFR 200.2]	200.28(c)(2) 200.28(c)(2)(i) 200.28(c)(2)(ii)
Additional Support	
An SWP school must include activities to ensure that students who experience difficulty attaining the proficient or advanced levels of academic achievement standards required by 34 CFR 200.1 will be provided with effective, timely additional support, including measures to –	200.28(d)
• Ensure that those students' difficulties are identified on a timely basis; and	200.28(d)(1)
• Provide sufficient information on which to base effective assistance to those students.	200.28(d)(2)
Transition	
An SWP in an elementary school must include plans for assisting preschool students in the successful transition from early childhood programs (such as Head Start or a preschool program under IDEA or a state-run preschool program) to the SWP	200.28(e)
Coordination and Integration with Other Programs	
If appropriate and applicable, an SWP should be developed in coordination and integration with other Federal, State, and local services, resources, and programs, such as programs supported under ESSA, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs, and schools and schools implementing comprehensive support and improvement activities or targeted support and improvement activities under ESSA 1111(d).	ESSA 1114(b)(5)

EVALUATION

ESSA 1114(b)(3) states that the plan and its implementation shall be regularly monitored and revised as necessary based on student needs to ensure that all students are provided opportunities to meet Kentucky's challenging academic standards and ensure continuous improvement. 34 CFR 200.26(c) explains that any revisions to the plan should be based on the results of the evaluation.

A school operating an SWP must –	34 CFR 200.26(c)
• Annually evaluate the implementation of, and results achieved by, the SWP, using data from Kentucky's annual assessments and other indicators of academic achievement;	200.26(c)(1)

• Determine whether the SWP has been effective in increasing the achievement of students in meeting Kentucky's academic standards, particularly for those students who had been the furthest from achieving the standards;	200.26(c)(2)
• Revise the plan, as necessary, based on the results of the evaluation, to ensure continuous improvement of students in the SWP	200.26(c)(3)

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 evidence-based models that improve students' academic achievement.

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 challenging 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 to determine if strategies are contributing to improvement in student achievement or increases in other activities like parent and family engagement 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, parent and family engagement, 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 making academic improvement.

See Appendix B for information on the annual review of a schoolwide program and the Title I Annual Review.

EFFECTIVE SCHOOLWIDE PROGRAMS

High-Poverty Schools and Effective Schoolwide Programs

- High concentrations of poverty can negatively impact the academic achievement of all students at a school.
- 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

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 required components of a schoolwide program. Even though schoolwide programs vary from one school to another, effective schoolwide programs have the following characteristics.

All staff should:

Agreed-Upon Vision

All staff should…

- 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 should…

- Focus on early childhood intervention.
- Use systematic, evidence-based academic models that are matched to the needs of the students.
- Devise appropriate modifications and differentiate instruction to accommodate students' strengths and weaknesses.

- Integrate 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 should…

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

Project Design

All staff should…

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

Parent and Family Engagement

All staff should…

- 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.
- Be willing to provide transportation and childcare services for parents to participate in school activities.
- Develop partnerships with local businesses and community groups to foster successful schools.

See Appendix C for a rubric to assess the quality of a schoolwide program.

See Appendix D for information on accountability for results and continuous improvement.

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.

Source: Efficacy of Schoolwide Programs to Promote Social and Character Development and Reduce Problem Behavior in Elementary School Children (Thomas B. Fordham Foundation).

PERSONNEL AND ITEMS WITHIN A SCHOOLWIDE PROGRAM

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 the well-rounded subjects of English, reading/language arts, mathematics, science, world languages, civics and government, economics, arts, history, and geography. The priority needs identified must determine how resources are used.

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.

Paraprofessionals in a Schoolwide Program: In a schoolwide program, paraprofessionals may be used to assist with instruction to students. NCLB requirements apply to all paraprofessionals with instructional duties in a schoolwide program. Regardless of funding, all paraprofessionals 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 Paraprofessional Assessment.
- 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 paraprofessional carries out and evaluates the achievement of the students with whom the paraprofessional is working; and
- The paraprofessional works in close and frequent proximity with the teacher.
- Not be pulled to be a substitute teacher in a classroom.

A program where a paraprofessional 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 paraprofessionals work in close and frequent proximity to a teacher. A program where a paraprofessional 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 paraprofessionals work in close and frequent proximity to a teacher.

Because paraprofessionals 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. Paraprofessionals 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 and family engagement activities;
- Act as a translator; or
- Provide instructional services to students under the direct supervision of a teacher.

Non-instructional Duties: A paraprofessional 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 paraprofessionals with instructional duties work in a program supported with Title I funds.

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

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

USING OTHER FUNDS AND CONSOLIDATION OF FUNDS

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.

Consolidating Federal, State, and Local Funds in a Schoolwide Program

By making systemic changes that knit together services funded from a variety of sources into a comprehensive framework, schools have a better chance of increasing the academic achievement of all students. To encourage this approach and better leverage all available funding, a schoolwide program school has the flexibility to consolidate funds from Title I and other federal education programs with state and local funds. (ESSA section 1114(a)(1), (3)). By consolidating funds in a schoolwide program, a school can more effectively design and implement a comprehensive plan to upgrade the entire educational program in the school as informed by the school's comprehensive needs assessment. When a school consolidates funds in a schoolwide program, those funds lose their individual identity and the school may use the funds to support any activity of the schoolwide program without regard to which program contributed the specific funds used for a particular activity.

Advantages of Consolidating Funds in a Schoolwide Program
• Flexibility to allocate all available resources effectively and efficiently. • A school is not required to meet most of the statutory and regulatory requirements of the specific federal programs included in the consolidation, provided it meets the intent and purposes of those programs. • A school is not required to maintain separate fiscal accounting records by federal program that identify the specific activities supported by each program's funds.

NOTE: A schoolwide program school has flexibility in its use of Title I funds even absent consolidation. The uses of Title I funds described throughout this document are available to a schoolwide program school that does not consolidate its Title I or other federal funds. Consolidation, however, affords even greater flexibility, as discussed above.

The following guidance documents contain additional information on consolidation of funds that may be useful for schools operating schoolwide programs:
Title I Fiscal Issues, pp. 49-63 (Feb. 2008)
(provides information on consolidating funds in a schoolwide program).
Notice Authorizing Schoolwide Programs to Consolidate Federal Education Funds and Exempting Them From Complying With Statutory or Regulatory Provisions of Those Programs, 69 FR 40360-64 (July 2, 2004) (provides information regarding which federal education programs may be consolidated in a schoolwide program and how a school can ensure that it meets the intent and purposes of the federal programs included in the consolidated schoolwide program).

FLEXBILITY OF FUNDS IN A SCHOOLWIDE PROGRAM

Consistent with the benefits identified above, a school operating a schoolwide program may use Title I funds for any activity that supports the needs of students in the school as identified through the comprehensive needs assessment and articulated in the schoolwide plan (ESSA section 1114(b)). In designing and implementing the schoolwide plan, a school must implement strategies that: (1) provide opportunities for all children to meet challenging state academic standards; (2) use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, which may include programs, activities, and courses necessary to provide a well-rounded education; and (3) address the needs of all students, but particularly those at risk of not meeting challenging state academic standards (ESSA section 1114(b)(7)(A)).

Examples of uses of funds in a schoolwide program (based on needs assessment)
• High-quality preschool or full-day kindergarten and services to facilitate the transition from early learning to elementary education programs. • Recruitment and retention of effective teachers, particularly in high-need subjects. • Instructional coaches to provide high-quality, school-based professional development. • Increased learning time. • Evidence-based strategies to accelerate the acquisition of content knowledge for English learners. • Activities designed to increase access and prepare students for success in high-quality advanced coursework to earn postsecondary credit while in high school (e.g., Advanced Placement, International Baccalaureate, early college high schools, and dual or concurrent enrollment programs). • Career and technical education programs to prepare students for postsecondary education and the workforce. • Counseling, school-based mental health programs, mentoring services, and other strategies to improve students' nonacademic skills. • School climate interventions (e.g., anti-bullying strategies, positive behavior interventions and supports). • Equipment, materials, and training needed to compile and analyze student achievement data to monitor progress, alert the school to struggling students, and drive decision making. • Response-to-intervention strategies intended to allow for early identification of students with learning or behavioral needs and to provide a tiered response based on those needs. • Activities that have been shown to be effective at increasing family and community engagement in the school, including family literacy programs. • Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators (including accessible devices and software needed by students with disabilities). • Two-generation approaches that consider the needs of both vulnerable children and parents, together, in the design and delivery of services and programs to support improved economic, educational, health, safety, and other outcomes that address the issues of intergenerational poverty.

The above table provides examples of some of the potential uses of funds available to schools when operating a schoolwide program. Each school, in conjunction with LEA officials, has the discretion to determine the specifics of a schoolwide plan, including which methods and instructional strategies will be used, based on the school's identified needs in its comprehensive needs assessment.

See Also

For specific questions or items concerning the setup of your schoolwide program you can view other guidance released by the Kentucky Department of Education. A short list is provided below.

1. Pre-School Section of this handbook
2. Title III Section of this handbook
3. Neglected and Delinquent Section of this handbook
4. SBDM Section of this handbook

Non-KDE sources:

5. Designing a Schoolwide Program (Non-Regulatory Guidance)
6. Summary of fiscal changes in ESSA

Suggested Documentation

It is recommended that you save the following items in the event of a monitoring visit. This is not meant to be an all-inclusive list, but rather provide guidance when it comes to documenting a Schoolwide Program.

District Monitoring Checklist — Schoolwide Program Sample Documentation	
• School Improvement Plan for selected schools.	☐
• Sample documents used in conducting needs assessment (e.g., test data, surveys, discipline reports, attendance reports, etc.) and summary of needs assessment.	☐
• School-level parent and family engagement plans describing how the school will implement the LEA Parent and Family Engagement Policy.	☐
• School-level parent and family engagement plans aligned with findings of the previous year evaluation and needs assessment.	☐
• Certification data.	☐
• Records of professional development activities/opportunities.	☐
• Records of recruitment and retention plans.	☐
• Evidence of annual public meeting.	☐
• Evidence of families included in meaningful, two-way communication.	☐
• Evidence of collaboration with community resources.	☐
• Documents demonstrating transition strategies between school and preschool programs and other transition plans as appropriate (e.g., between elementary and middle school programs, and middle and high school programs for helping students make the transitions from early childhood elementary or from elementary to middle, and middle to high school)	☐
• Samples of personal education plans and/or instructional intervention plans.	☐
• Samples of school communications to parents.	☐

TARGETED ASSISTANCE SCHOOL REQUIREMENTS

ESSA, 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, world 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.

Eligible Schools: The school may choose to implement either a schoolwide or targeted assistance program based on the needs assessment. If a school doesn't qualify for a schoolwide program it is eligible for a targeted assistance program. Every A1 school in Kentucky with more than 0% low income and less than 100% low income students is eligible for a targeted assistance program.

Seven Components of a Targeted Assistance School	
#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 evidence-based instructional strategies 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 and family engagement, 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.

Setting up a Targeted Assistance Program

Step One:

Identify Needs
Guiding Questions: 1. What is the scope/focus? 2. On what content areas will the program focus? 3. What grade(s) will be served? 4. What method of service delivery will be used?
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.

Step Two:

Selecting Students
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.
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, early childhood education 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. • A sample eligibility list for Title I, Part A services in a Targeted Assistance School can be found in Appendix E.
Children are then 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. 1. Classroom teachers rate only the eligible students in the focus area identified by the needs assessment. Sample ranking sheets can be found in Appendix F and Appendix G. Revise the ranking sheet for different ability levels and to fit the school's needs. 2. 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. 3. 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.

Step Three:

Designing the Program
Guiding Questions: 1. How will services be provided? 2. Which program design model is most appropriate for my school/students based on needs (pull out program, extended time, in-class)? 3. Where will services be provided (in-class or after school)? 4. What resources are needed?
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: ESSA 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. 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.

Step Four:

Continuous Improvement/Evaluate the Program

Targeted-Assistance Programs should be evaluated yearly, at a minimum. Things to consider include:

1. Does the plan have a clear direction for the school as to what needs to be done when reviewing the data of the student population?
2. How does the school know the desired results have been achieved?
3. Are the services and resources actually achieving the results expected?
4. What is working and what can be improved?
5. How will success be measured?
6. Are the content areas and student populations are being targeted experiencing growth?
7. Are students meeting the State's academic standards?
8. Is high-quality scientifically based research being conducted?

At the end of the review:

1. Re-establish responsibilities, timelines and models needed to implement revised plan.
2. Revise the targeted assistance plan as needed.
3. Go back to Step 1 using revised plan.

Suggested Documentation

It is recommended that districts save the following items in the event of a monitoring visit. This is not meant to be an all-inclusive list, but rather provide guidance when it comes to documenting a Targeted Assistance Program.

District Monitoring Checklist — Targeted Assistance Program Sample Documentation	
• Needs assessment data summary of needs.	☐
• A copy of selection procedures, multi-criteria scoring instrument, eligibility lists, participants list for all schools with targeted assistance programs.	☐
• Documentation used for selection process preschool to grade 2, eligibility, participants list, and records of meetings with Title I staff in participating schools and/or preschool programs.	☐
• Program narratives for all schools with targeted assistance programs.	☐
• Copy of curriculum, instructional materials used in a project, research literature supporting selected programs.	☐
• Duty rosters for school staff and Title I teacher schedules.	☐
• Student portfolio samples including ongoing assessment data.	☐
• School-level parent and family engagement policy, records of meetings, training sessions, communication, and signed school-family compacts.	☐

PARENT AND FAMILY ENGAGEMENT

ESSA Title I, Part A Section 1116

Involving families as partners in the education process is critical throughout a child's academic career. When families support learning, children are more successful in school and school success helps children become successful adults. The district must provide opportunities for families to actively participate in the planning, implementation and review of school and district Title I, Part A programs. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (ED) Non-Regulatory Guidance for Title I Parent Involvement.

According to A-3 of ED's 2004 guidance and 20 U.S.C. §7801(31), the term "parent" includes a legal guardian or other person standing in *loco parentis* (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the child's welfare).

Funding Parent and Family Engagement Activities

Any district with an allocation of more than $500,000 must set aside 1% of its allocation to carry out the required parent and family engagement activities. At least 90% of the funds set aside for parent and family engagement activities must be distributed to the schools (this amount was 95% under NCLB). Districts with an allocation of $500,000 or less are still required to implement the parent and family engagement requirements in the statute but are not required to have a specified minimum expenditure. Parents must be involved in the decisions as to how the parent and family engagement funds are allocated for parent and family engagement activities.

ESSA Section 1116(a)(2)(D) states that funds reserved by the LEA must be used to carry out activities and strategies consistent with the district parent and family engagement policy. Funds must be used for at least one of the following:

- Supporting schools and nonprofit organizations in providing professional development for the LEA and school personnel regarding parent and family engagement strategies, which may be provided jointly to teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, early childhood educators, and parents and family members.
- Supporting programs that reach parents and family members at home, in the community, and at school.
- Disseminating information on best practices focused on parent and family engagement, especially best practices for increasing the engagement of economically disadvantaged parents and family members.
- Collaborating, or providing subgrants to schools to enable such schools to collaborate, with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
- Engaging in any other activities and strategies that the LEA determines are appropriate and consistent with the district parent and family engagement policy.

Districts providing Title I services to private schools must reserve funds for parent and family engagement activities for parents of participating private school children. 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 and family engagement funds to be reserved from the district's parent and family engagement funds for the private school is 5%.

Building Capacity for Engagement

ESSA 1116(e)(1-5) explains that to ensure effective engagement of parents as well support a partnership among the school, parents, and the community to improve student academic achievement, each district and school must:

- Assist parents in understanding state academic content standards, state academic achievement standards, state and local academic assessments, the requirements of the Title I, Part A program, and how to monitor their child's progress and work with educators to improve the achievement of their children.
- Provide training and materials to help parents work with their children to improve their achievement, such as literacy and technology training.
- Train staff with the assistance of parents on how to reach out to, communicate and work with parents as partners in their children's education thereby building ties between the parents and the school.
- Implement and coordinate parent programs and activities, such as parent resource centers, that encourage and support parents in participating in the education of their children.
- Ensure that information about school activities and meetings are provided to parents in a format and language they can understand.
- Coordinate and integrate parent and family engagement programs with early childhood education programs, Head Start, the Home Instruction Program for Preschool Youngsters, the Parents as Teachers Program, and public preschool to support parents in helping in their children's education.

ESSA 1116(e)(6-13) provides additional suggestions in building engagement, stating that the district may:

- Involve parents in the development of training for staff to improve the effectiveness of the training.
- Pay reasonable and necessary expenses associated with local parent and family engagement activities. This may include providing 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 with parents who are unable to attend such conferences at school.
- Adopt and implement model approaches to improve parent and family engagement and provide support for parent and family engagement as requested by parents.
- Establish a districtwide parent advisory council and involve community organizations and businesses in parent and family engagement activities.
- Train parents to help promote the involvement of other parents.
- Provide literacy training, if no other funds are available for training.

See Appendix H for a list of resources to improve parent and family engagement.

Recommendations to Develop Effective Parent and Family Engagement

- Recruit and encourage families 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., videos, 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.

Parent and Family Engagement in Schoolwide Programs & Targeted Assistance Schools

All schools receiving Title I, Part A funds, both Schoolwide Programs (SWPs) and Targeted Assistance Programs (TASs), are required to include a parent and family engagement component in their plan. Section 1114(b)(1)(F) of ESSA state that the schools operating an SWP must provide strategies to increase parent and family engagement in accordance with ESSA Section 1116. Section 1115(c)(1)(G) of ESSA details the same requirement for schools operating a TAS program.

The characteristics and actions of an effective parent and family engagement program should be the same no matter what type of Title I, Part A program is in place. The difference between the two will depend on the specific parents receiving services. Title I, Part A parent and family engagement activities should be geared towards the parents of participating children. All students benefit from funds and services in an SWP, therefore all parents are the focus of the parent and family engagement efforts. In a TAS, only certain students receive Title I, Part A services, meaning that the parents of those students are the ones who should receive parent and family engagement services.

District Level Parent and Family Engagement Requirements

District Parent and Family Engagement Policy

Each LEA receiving Title I, Part A funds must develop a written parent and family engagement policy. The policy is developed jointly, agreed upon, and distributed to parents of participating children. The policy should be reviewed (and revised as needed) with parents of participating children at the district's annual Title I meeting. Documentation of the review and revisions should be on file in the district Title I coordinator's office.

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

1. Involve parents in the joint development of the district improvement plan outlined in ESSA Section 1112 and the process of school review and improvement under ESSA Section 1116;
2. Provide the coordination, technical assistance and other support necessary to assist participating Title I schools in planning and implementing effective parent and family engagement to improve student academic achievement and school performance;
3. Build the schools' and parents' capacity for more effective parent and family engagement described in ESSA Section 1116(e);
4. Coordinate and integrate parent and family engagement strategies with strategies under other early childhood education programs such as Head Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters;
5. Conduct an annual evaluation of the content and effectiveness of the parent and family engagement policy with parents. The evaluation should include the policy's ability to improve the academic quality of the schools, including identifying barriers to greater participation of parents, the needs of parents and family members to assist with the learning of their children, and strategies to support successful school and family interactions. Parents should be invited to design strategies for more effective parent and family engagement. Particular attention should be given to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background;
6. Involve parents in the activities of schools receiving Title I, Part A funds.

See Appendix I for a district parent and family engagement policy checklist.

Annual Evaluation

The effectiveness of the district's parent and family engagement policy and parent and family engagement activities must be reviewed every year. The evaluation will determine whether:

- The academic quality of the district 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. In addition to summarizing and documenting the evaluation findings, the district must document how the findings will be used to improve the parent and family engagement program.

See Appendix J and Appendix K for sample Title I program parent surveys. See Appendix L and Appendix M for sample parent and family engagement evaluation forms. The surveys and forms may be used with non-public school parents as well.

School Level Requirements

School Parent and Family Engagement Policy

Each school receiving Title I, Part A funds must develop a written parent and family engagement policy. The policy is developed jointly, agreed upon, and distributed to parents of participating children. The policy should be reviewed (and revised as needed) by parents of participating children at the school's annual Title I meeting. Documentation of the review and revisions should be on file in the school as well as at the district Title I coordinator's office.

A school's written parent and family engagement policy must establish expectations for parent and family engagement and describe how the school will:

1. Hold a meeting, at a convenient time, for the families of participating children. All parents and family members of participating children should be invited and encouraged to attend. The purpose of the meeting is to inform families of their school's participation in the Title I, Part A program and explain the requirements associated with the program as well as the right of the families to be involved.
2. Offer a flexible number of meetings (such as before or after school and evenings), and consider providing 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, Part A program including the planning, review and improvement of the school parent and family engagement policy and the joint development of the SWP plan under ESSA Section 1114(b)(2). Families must be notified of the written policy in a format that is easy to understand and in a language the parents can understand. The policy shall be made available to the local community and updated periodically to meet the changing needs of parents and the school.
    a. There is a special rule regarding a school's written parent and family engagement policy in ESSA Section 1116(b)(2). If the school has a parent and family engagement policy that applies to all parents and family members, the school may amend their existing policy, as necessary, to meet the requirements of ESSA 1116(b).
4. Provide parents of participating children —
    a. Timely information about Title I, Part A programs;

   b. School performance reports; including a description and explanation of the school's curriculum, common core state standards, forms of academic assessment used to measure student progress and the proficiency levels students are expected to meet;
   c. Their student's assessment results;
   d. Additional opportunities for parents to offer suggestions and participate in decisions relating to the education of their children; and
5. If the SWP plan is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA.

See Appendix N for a school parent and family engagement policy checklist.

No two schools should have identical parent and family engagement policies as no two schools are identical. Although there may be similarities, the document should reflect the unique population of the individual school and the contributions made by the families of that school.

School-Family Compacts

All schools receiving Title I, Part A funds must develop a school-family compact jointly with parents of participating children. The compact should outline how parents, school staff and students will share the responsibility for improved academic achievement as well as how the school and parents will build and develop a partnership to help children achieve Kentucky's high standards. The compact must —

1. Describe the school's responsibility to provide high quality curriculum and instruction to participating children to meet Kentucky's academic achievement standards.
2. Describe how parents will be responsible for supporting their children's learning; this may include items such as 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, at a minimum —
   a. Parent-teacher conferences in elementary schools, at least annually to discuss the compact and how it relates to individual student progress and achievement;
   b. Frequent progress reports to families on student academic progress;
   c. Reasonable access to staff and opportunities to volunteer, observe and participate in classroom activities.

See Appendix O for a sample of a school-family compact checklist.

As is the case with parent and family engagement policies, no two schools should have identical school-family compacts.

School-Family Compact Signatures

The Kentucky Department of Education (KDE) requires school-family compacts be signed by all involved parties (school representative, parent/guardian, and student) and kept on file at each school as documentation. Since shareholders sign the compact itself and turn it in, a best practice is to make a copy of the compact readily available for reference such as in the school handbook or on the school webpage. The language in the sample compact below could be used to collect the necessary signatures and verify all parties have read and agreed to the school-family compact.

School-Family Compact
[*Insert School Name*]
[*School Year 20XX – 20XX*]

Dear Parent/Guardian,

[*Insert School Name*], students participating in the Title I, Part A program, and their families, agree that this compact outlines how the families, the entire school staff, and the students will share the responsibility for improved student academic achievement as well as describes how school and families will build and develop a partnership that will help children achieve the State's high standards.

Please sign and date below to acknowledge that you have read, received, and agree to this School-Family Compact. Once signed, please return the form to your child's teacher. A copy of the compact can be located [*in the school handbook/on the school webpage/etc.*]. The School-Family Compact will be discussed with you throughout the year at different school-family events as we work together to help your child succeed in school. We look forward to our school-family partnership!

School Representative Signature: _____ Date: _____

Parent/Guardian Signature: _____ Date: _____

Student Signature: _____ Date: _____

Parents' Right to Know

ESSA 1112(e)(1)(A) and 34 C.F.R. Part 200.61 (EDGAR) state that at the beginning of the school year, an LEA must notify the parents of each student attending a Title I school that the parents may request, and the LEA will provide the parents on request, information regarding the professional qualifications of the student's classroom teachers, including, at a minimum, the following:

- Whether the teacher has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction.
- Whether the teacher is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived.
- The baccalaureate degree major of the teacher and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree.
- Whether the child is provided services by paraeducators and, if so, their qualifications.

This information should be provided to parents in the fall through a general medium such as a letter or included in a parent handbook. The letter can be included as part of the report card overview if such a document is already being sent by the district. See Appendix P for a sample notification of right to request teacher qualifications letter.

Participating Title I schools are required by ESSA 1112(e)(1)(B) and 34 C.F.R. Part 200.61 to provide each parent with the following:

- Information on the level of achievement of the parent's child in each of the State academic assessments required under 34 C.F.R. Part 200.2.
- Timely notice that the parent's child has been assigned, or has been taught for four or more consecutive weeks by a teacher who does not meet applicable State certification or licensure requirements at the grade level and subject area in which the teacher has been assigned.

Annual Meeting

All Title I schools must 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 and family engagement statute, and the parent's right to be involved. Some best practices regarding the annual meeting are as follows:

- Offer a flexible number of meetings (before or after school and evenings).
- Provide transportation, child care, or home visits if necessary.
- Involve parents in an organized, ongoing, and timely manner, in the planning, review, and improvement of the Title I program including the planning, review, and improvement of the Parent and Family Engagement Policy and the joint development of the schoolwide program plan.
- 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.
- Provide an opportunity for parents to submit comments on the schoolwide program plan once the plan is made available to the district.

Family Engagement and Communications Timeline	
September	• Review and update parent/guardian notification of parents' right-to-know, as described in ESSA Section 1112(e) and 34 C.F.R. Part 200.61 (EDGAR) • TAS: Ensure Title I schools have targeted students, set up files, notified parents, and implemented targeted assistance services.
October	• Design evaluations for district and school family engagement activities. • Ensure each Title I school has provided an informational meeting about the Title I program for families.
November	• Ensure school–family compacts are distributed. • Ensure each Title I school has published a listing of the opportunities available for families to build their capacity to be actively involved in the children's education.
December	• Distribute report cards or report card overviews.
June	• Review and update district parent and family engagement policy based on data (e.g., evaluations). • Review and update school parent and family engagement policy based on data (e.g., evaluations). • Review and update school–family compact.
Ongoing	• Engage in family and community involvement. Maintain documentation of these activities (meeting agendas and notes, meeting notifications, sign-in sheets, etc.). • Review and update school parent and family engagement policy based on data (e.g., evaluations). • Review and update school–family compact.

Suggested Documentation

It is recommended that you save the following items in the event of a monitoring visit. This is not meant to be an all-inclusive list, but rather provide guidance in documenting parent and family engagement in Title I schools.

District Monitoring Checklist — Parent and Family Engagement Sample Documentation	
• LEA Parent and Family Engagement Policy.	☐
• Notice of parent meetings, agendas, minutes, sign-in sheets, records of parent comments to support dissemination procedures.	☐
• Title I budget reflecting required set-aside, distribution procedures of funds to participating schools, and samples of expenditures to date.	☐
• Meeting agendas, minutes, and sign-in sheets for parent advisory council.	☐
• Parent and Family Engagement Policy and School-Family Compact. Keep draft versions to indicate how parents influence school policy. Signed copies of compacts should be maintained at each school.	☐
• Sample school/class newsletters.	☐
• Copies of parent surveys and summary of results.	☐
• Fliers, sign-in sheets and summaries of Parent Nights.	☐
• Annual evaluation of the parent and family engagement program.	☐
• Parents' right-to-know	☐
• Documentation of translation services.	☐
• Log of phone calls, conferences, etc.	☐
• A record of families' disagreements with an LEA's Title I plan or a Title I SWP.	☐
• Parent notices such as: details about assessments and parents' right to opt out; details about innovative assessment systems if a local district is participating in one; or intention to use a locally-selected assessment with high school students.	☐

SERVICES TO TITLE I ELIGIBLE PRIVATE SCHOOL CHILDREN

ESSA Section 1117

Title I of Every Student Succeeds Act (ESSA) requires public school districts to provide support to private school students who would be otherwise eligible for Title I services. This section of the handbook specifically addresses the situations in which Title I funds must be used in support of Title I eligible private school children. This section can be used in conjunction with the following U.S. Department of Education (ED) guidance:

Fiscal Changes & Equitable Services Requirements (Nov 21, 2016)
Ensuring Equitable Services to Private School Children Toolkit
Title I Services to Eligible Private School Children (Oct 17, 2003)

Determining Equitable Services

ESSA 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 ESSA, 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, early childhood education program 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 and family engagement services for the teachers and families of participating private school children.

Equitable Services Under ESSA

ESSA changes what equitable services look like but most importantly, how they are funded. **ESSA section 1117(a)(4)(A)** states that private school funding must come off the top of the allocation before any district set asides are allowed. Essentially, a local educational agency (LEA) must determine the proportionate amount of Title I funds received by an LEA prior to any allowable expenditures or transfers of funds.

This includes:

1. Transfers of funds
2. Reservations for administrators
3. Parent and Family Engagement
4. District-wide initiatives

Determining the proportionate share

Once an LEA has established the participating public school attendance areas (see B-1 and B-2 of the Title I Services to Eligible Private School Children (Oct. 17, 2003)), it would first determine the number of children from low-income families residing in each participating public school attendance area who attend public schools and private schools. The LEA would then determine the overall proportion of children from low-income families who reside in participating public school attendance areas and who attend public schools and private schools. Using the proportion of children from low-income families who attend private schools, the LEA would determine the amount of funds available for equitable services based on that proportionate share of the LEA's total Title I allocation.

Sample Calculations for Determining Equitable Services in Private Schools

District Allocation: $1,054,706 (*serving one private school*)

EXAMPLE OF DETERMINING THE AMOUNT OF TITLE I FUNDS FOR EQUITABLE SERVICES			
Public School Attendance Area	**Number Of Public School Low-Income Children**	**Number Of Private School Low-Income Children**	**Total Number Of Low-Income Children**
A	379	4	383
B	341	15	356
C	276	4	280
D	155	1	156
E	146	8	154
F	266	1	267
TOTAL	**1563**	**33**	**1596**
PROPORTIONATE SHARE	97.93%	2.07%	
	$1,032,898	$21,808	

EXAMPLE OF EQUITABLE SERVICES FOR PARENTS AND FAMILIES OF ELIGIBLE PRIVATE SCHOOL CHILDREN			
LEA'S TITLE I ALLOCATION	**1% for parent and family engagement**	**Proportionate share for equitable services for parents & families** *(2.07% from previous example)*	**Source of funds for equitable services for parents & families** *(proportionate share of $21,808 under previous example)*
$1,054,706	$10,547.06	$218.32	**$21,808 - $218.32 = $21,589.68** remaining for instruction & professional development
$10,328.74 reserved from the $1,032,898 for Title I activities in public schools for parents and families of participating public school students			

EXAMPLE OF DETERMINING THE AMOUNT OF FUNDS AVAILABLE FOR INSTRUCTION FOR ELIGIBLE STUDENTS IN SPECIFIC PRIVATE SCHOOLS		
Amount of funds for equitable services for instruction, administration, & professional development	**After consultation, amount reserved by LEA for administration & professional development**	**Amount available for instruction in SY 2017-2018**
$21,590	$1,500	$20.089.68 *($21,589.68 - $1,500)*

- A new provision under ESSA requires that funds received by an LEA that are allocated to services for private school students must "be obligated in the fiscal year for which the funds are received." The 2016 guidance explains that this provision is meant to ensure private school students, teachers, and families receive services "in a timely manner." 2016 Guidance (N-6 & N-7).

What is required of each district?

- Districts must provide educational services or other benefits under Title I, on an equitable basis and in a timely manner, to all eligible non-public school children.

- Districts must ensure that teacher and family engagement activities occur on a basis equitable to the participation of their public school counter parts.
- Districts must provide services that are secular, neutral and non-ideological.

Which private school students are eligible?

- Students must reside in the attendance area of the district and this applies based on location of residence even if the private school is not located inside the district. One caveat is the public school a student would attend if not in private school must be receiving Title I services for the student to be eligible.
- Students must be identified by the district – not the private school – as failing or most at risk of failing to meet the state's challenging academic standards. This determination should be worked out during consultation (more later) between the private and public school officials. However, it should be a determination that is as equitable as possible between public and private school children.

Delivery of Service:

ESSA does not require any specific program designs or delivery methods on school districts in regards to servicing private school children. The ED guidance from 2003 notes a few possible options which could be provided directly by the public school district or by a third-party contractor.

The following instructional services can be provided on the premises of the private school, at the public school site, or in mobile classrooms:

- Dual enrollment
- Educational radio and TV
- Computer-assisted instruction
- Extended-day services
- Home tutoring
- Take-home computers and interactive technology

These are not the only methods in which instruction may be provided but are possible services listed in the 2003 guidance (B-37).

Timely and Meaningful Consultation:

ESSA requires that an LEA provide "timely and meaningful consultation" to eligible private schools that elect to receive services. This should occur between LEA officials that represent the Title I program and private school officials that will help with the consultation process. ESSA does contain new language that states both LEAs and private school officials "shall have the goal of reaching agreement on how to best provide equitable and effective programs to eligible private school children."

Which schools must be contacted?

- Every school year (generally in late winter/early spring), an LEA must contact officials from every private school serving students in its enrollment area. A sample letter of notification to private schools can be found in Appendix Q.
- This includes private schools located outside the LEA's boundaries.

Consultation Topics:

ESSA made substantial changes to the list of required topics that must be covered in a private school consultation. Under **Section 1117(b)(1)**, LEA officials must consult with private school officials on the following topics:

1. How will the LEA identify private school children for services.
2. What services will be offered.
3. How, where, and by whom will the services be provided.
4. How the services will be academically assessed and how the results of that assessment will be used to improve the Title I program.
5. The size and scope of the equitable services to be provided. Also, the proportion of funds that is allocated for these services and how that proportion of funds has been determined.
6. The method and sources of data that will be used to determine the number of children from low-income families in participating school attendance areas who attend private schools, including whether data will be extrapolated if a survey is used.
7. How and when the LEA will make decisions about the service delivery mechanism that the LEA will use to provide equitable services. This discussion must allow for thorough consideration and analysis of private school officials' view on the provision of services through a third-party provider.
8. How, if the LEA disagrees with the private school officials about the provision of services through a contractor, the LEA will provide the private school officials a written analysis of its reasons for the decision.
9. Whether the LEA will provide service directly, or through a separate government agency, consortium, entity, or third-party contractor.
10. Whether to provide services to eligible private should children under a pool arrangement or to individual schools, based on the number of eligible children from each school.
11. When, including the approximate time of day, services will be provided.
12. Whether to consolidate and use Title I funds for equitable services with other ESSA programs.

Ideally, consultation with private school officials should begin in the spring (or earlier) prior to the school year for which services are planned. See Appendix R for a suggested timeline. At a minimum, however, LEA officials must ensure:

1. Consultation takes place before any decisions are made affecting services to private school children; and

2. Services for private school students begin at the same time as services for public school students, presumably at the start of the school year.

NOTE: While an LEA must give full consideration to the views and perspectives of private school representatives, it is the LEA – not the private school – that is charged with making final decisions about the most effective way to raise the academic performance of participating students. ESSA does require in **1117(b)(2)** that if, for some reason, after consultation the public school disagrees with the views of the private school on how to best serve the students, the LEA must provide an explanation of the decision in writing to the Private School officials in a timely manner. (Regarding responsibility of the Title I program: 2003 Guidance B-35).

Assessing the Program:

- Nothing in the ESSA or its regulations requires a private school, including a private school whose students receive services under Title I, Part A, to participate in a state's academic assessment system.

- If the district provides services to eligible private school students under Title I, Part A, the district must, through timely consultation with appropriate private school officials, determine how to assess academically the services to eligible private school students**. ESSA Section 1117(b)(1)(D).**
- For more information on assessing your private school program please consult the 2003 guidance.

Ombudsman

ESSA sections 1117(a)(3)(B) and 8501(a)(3)(B) establishes the office of Ombudsman at KDE. The Ombudsman at KDE is the primary point of contact for addressing questions and concerns from private school officials and LEAs regarding the provision of equitable services under Title I and Title VIII. In addition, the KDE Ombudsman monitors and enforces the equitable services requirements and will have a significant role in the state monitoring process.

KDE Ombudsman Contact Information	
Name	**Hiren Desai**
Phone Number	**(502) 564-5130 ext. 4002**
Email	kpso@education.ky.gov

Signed Affirmations (sent to Ombudsman)

After the initial consultation the LEA must submit to the KDE Ombudsman:

- ESSA requires an LEA to maintain in its records, and provide to the SEA a written affirmation that timely and meaningful consultation has occurred, and that all of the required consultation topics were covered.
- Documentation: Each LEA is expected to maintain in the agency's records, and provide to KDE, a written affirmation signed by the officials of each participating private school that meaningful consultation has occurred. The written affirmation must provide the option for private school officials to indicate their belief that timely and meaningful consultation has not occurred or that the program design is not equitable with respect to eligible school children. If the private school does not provide the affirmation in a reasonable period of time, the LEA should forward all documentation that consultation has – or attempts at consultation – take place. **(ESSA section 8501(c)).** A sample consultation agreement form which a district could use for the required consultation can be found in Appendix S of the handbook and on the Title I, Part A website.
- Once the initial consultation phase and the signed affirmation are completed, the LEA should continue frequent communications with private school teachers and officials to ensure adequate supervision of the program and evaluate its progress.

Other roles of the KDE Ombudsman:

- Serve as a general resource regarding equitable services requirements for both LEAs and private school officials, which may include conducting initial outreach to define the contours of the Ombudsman's responsibilities.
- Develop, in partnership with other relevant SEA staff, monitoring protocols applicable to the provision of equitable services and participate in a sample of any monitoring activity.
- Provide technical assistance regarding equitable services requirements for SEA staff administering applicable programs, LEA staff, and private school officials.
- Establish a process for receiving documentation of agreement from LEAs consistent with the consultation requirement that the results of such agreement shall be transmitted to the Ombudsman. **(ESSA section 1117(b)(1)).**
- Participate in the State's Title I Committee of Practitioners **(ESSA section 1603(b))** and, as applicable, nonpublic schools working group.

- The Ombudsman also should serve as the primary point of contact for responding to and resolving any complaints regarding equitable services that the SEA receives under its ESSA complaint procedures.

Further information about the processes and role of the KDE Ombudsman will be communicated directly from the Ombudsman office.

Other Info:

For info on the following topics please consult the 2003 Guidance issued by ED.

- Control of Title I funds, materials and equipment, B-41 and B-47
- Supplement vs. Supplant, B-42
- Location of services, B-42
- Religious Symbols, B-46
- Establishment Clause, B-43
- Paraprofessionals, B-52
- Teacher Qualifications, B-55

Other Resources:

- Appendix T – Sample Private School Students Eligibility List for Title I, Part A Services
- Appendix U – Sample 1: Ranking of Eligible Private School Students for Title I, Part A Services
- Appendix V – Sample 2: Ranking of Eligible Private School Students for Title I, Part A Services
- Appendix W – End of Year Title I Survey for Private School Teachers
- Appendix X – Memorandum to Private Schools

Suggested Documentation

It is recommended that you save the following items in the event of a monitoring visit. This is not meant to be an all-inclusive list, but rather provide guidance in documenting equitable services to eligible private school children.

District Monitoring Checklist — Private School Sample Documentation	
• Letters to non-public schools, notice(s) of meetings, meeting agendas, meeting minutes for initial consultation on plan development.	☐
• Notice of meetings, meeting agendas, meeting minutes for participating private school ongoing consultations.	☐
• Private school/LEA set-asides, purchase orders from private schools, program description, FTE report, contracted services documents (if applicable).	☐
• Names and addresses of participating students	☐
• Proof of on-going consultation with private school officials (meeting agendas, minutes, sign-in sheets, walkthrough/observation notes, emails, etc.)	☐
• Proof of communication with parents of private school students (conferences, call log, meeting notes)	☐
• Copy of contract if a third party is being used to provide Title I services at private schools	☐
• Compact between the district and families of participating students	☐
• Documentation of professional development provided by the district	☐
• Assessments used to diagnose achievement of individual students	☐
• Letter/form showing private schools were contacted about participating in Title I	☐
• Teaching certificate/EPSB documentation of Title I teacher providing services	☐
• Proof that paraeducators providing services meet ESSA requirements	☐
• Dates and notes of parent and family engagement activities	☐
• Copy of procedures from Title IX, Part A, Uniform Provisions Subpart 1	☐
• Copy of resolution of complaints	☐

PARAEDUCATORS

ESSA Section 1111(g)(2)(J) and (M)

The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (ED) Non-Regulatory Guidance for Title I Paraprofessionals. Visit KDE's Kentucky Paraeducator Requirements webpage for more information regarding paraeducators in Kentucky.

For the purpose of Title I, Part A, a paraeducator (also called paraprofessional) is an employee of a local educational agency (LEA) 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. Because paraeducators provide instructional support, they should not be providing planned direct instruction, or introducing to students new skills, concepts, or academic content.

The ESSA addresses educational qualifying factors for paraeducators. The qualifications for paraeducators under NCLB remain in place under ESSA. According to Section 1111(g)(2)(J), paraeducators must meet the same qualifications for state requirements "that were in place on the day before the date of enactment of ESSA." These qualifications are listed in ESSA Section 1119(c)(1)(A-C). Specifically, all paraeducators working in a program supported with Title I, Part A funds must have a secondary school diploma or its recognized equivalent. The additional qualifying educational requirement for Title I, Part A funded paraeducators may be met by any one of the following:

- Complete two years of study at an institution of higher education; or
    - "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 ESSA educational requirement. 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.
- Obtain an associate's degree (or higher); or
- Meet a rigorous standard of quality and be able to demonstrate, through a formal State or local academic assessment, knowledge of the ability to assist in instructing 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. The revised 2nd edition October 2009 version of the Kentucky Paraeducator Assessment (KPA) is the state's formal academic assessment.

Individuals Required to Meet the ESSA Educational Requirement

1. Paraeducators with instructional duties in any program supported by Title I, Part A funds must meet the ESSA educational requirement. Individuals who have both instructional and non-instructional duties must meet the ESSA educational requirement because they carry out some instructional support duties.

- For a Schoolwide Program (SWP), all paraeducators with instructional duties must meet the ESSA educational requirement without regard to whether the position is funded with Federal, State, or local funds. In a SWP, Title I funds support all teachers and paraeducators.
- For a Targeted Assistance Program (TAS), only paraeducators with instructional duties who are paid with Title I, Part A funds must meet the ESSA educational requirement.

2. Paraeducators employed by the district to provide Title I, Part A instructional services to eligible private school students must meet the ESSA educational requirement.

Individuals Not Required to Meet the ESSA Educational Requirement

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 ESSA educational requirement. This also applies to paraeducators who work as interpreters for the deaf and hard of hearing.
2. Paraeducators whose duties consist solely of conducting parent and family engagement activities consistent with ESSA Section 1116 are not required to meet the ESSA educational requirement.
3. Paraeducators with instructional duties in a targeted assistance school that are funded through state or local funds are not required to meet the ESSA educational requirement.
4. 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 ESSA educational requirement.
5. Individuals who provide non-instructional support to special education students are not required to meet the ESSA educational requirement. This includes individuals who solely provide personal care services or serve as bus or health aides for special education students.
6. 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 ESSA educational requirement unless they work in a SWP school or are paid, in whole or part, with Title I, Part A funds.
7. 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 SWP and are not funded with Title I, Part A funds are not required to meet the ESSA 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.
8. Paraeducators working in schools (or districts) that do not receive Title I, Part A funds are not required to meet the ESSA educational requirement.
9. AmeriCorps volunteers and other volunteers are not considered employees of districts and are not required to meet the ESSA 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.
10. Individuals working in 21st Century Community Learning Center Programs are not required to meet the ESSA 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 SWP. The educational requirement does not apply to staff of 21st Century programs that are not employees of the district.

Allowable Duties for Paraeducators

Each LEA receiving assistance under this part shall ensure that a paraeducator working in a program supported with Title I, Part A funds is not assigned a duty inconsistent with this section.

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 SWP, all paraeducators with instructional duties must work under the direct supervision of a teacher. For a TAS, 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.

The following programs would be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher:

- A program where a paraeducator provides instructional support and a teacher visits a site once or twice a week but otherwise is not in the classroom.
- 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.

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 and family engagement 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 PD 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 PD to help paraeducators become certified and licensed teachers.
2. **Title II, Part A** (Teacher Quality Program) funds may be used to provide PD 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 PD to help paraeducators become certified and licensed teachers.
3. **Title III, Part A** (English Language Acquisition) funds may be used to provide PD for teachers and other instructional personnel providing instruction to students who need English language acquisition and language enhancement.
4. **Title V** funds may be used to provide PD for teachers and other instructional personnel providing instruction to students of the district. Title V spending restrictions due to improvement status have been waived.

Sample Documentation

It is recommended that you save the following items in the event of a monitoring visit. This is not meant to be an all-inclusive list, but rather provide guidance when it comes to documenting the role of paraeducators in Title I schools.

District Monitoring Checklist — Paraeducators Sample Documentation	
• LEA professional development plan.	☐
• Evidence of professional development aligned to needs and PD evaluations.	☐
• Samples of Individual Growth Plans, Professional Development Plans, etc.	☐
• Copies of right-to-know notifications.	☐
• Time and Effort documentation (i.e., Personnel Activity Reports (PARs), Semi-annual certification).	☐
• List of payments for contracted services for all federal program funds.	☐
• Documentation that the paraeducator meets ESSA eligibility standards (transcripts, passing score on KPA)	☐
• Daily schedule and list of instructional and non-instructional duties	☐

PRESCHOOL AND TITLE I

ESSA Sections 1112, 1114 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 succeed. For the purposes of Title I, a preschool program is a program of educational services for eligible children below the age at which the local educational agency (LEA) provides elementary education and is focused on raising the academic achievement of children once they reach school age. Children from birth to the age that the district provides a free public elementary education may receive preschool services. [ESSA 1115(b)(1)(A)(ii)] The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (ED) Serving Preschool Children Through Title I Non-Regulatory Guidance and Non-Regulatory Guidance for Expanding Opportunities to Support our Youngest Learners.

Visit KDE's Preschool/Primary webpage for more information on preschool programs in Kentucky.

Funding Preschool Programs

A district may reserve funds to operate Title I preschool programs. Those funds may be distributed to other comparable public early childhood education programs (such as Head Start and other early childhood education programs) 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. Title I funds may be used to provide services directly to eligible preschool children, help with the transition to kindergarten, and supplement or extend the existing preschool program. Outside providers can be subcontracted using Title I funds.

A district or school is not required to serve preschool students. 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. If a district opts to use Title I funding for early learning, a strategy must be developed and described in their Title I plan. This description should include how the district will support, coordinate, and integrate Title I services with early childhood education programs at the district or school level. The plan should also include details on transitioning children from early childhood education to elementary school.

A Title I district or school may use Title I funds to support a district-operated preschool program or a school-operated preschool program. Title I funds may also be used in coordination with other preschool programs, based on the needs of its eligible students and the most effective way to use the funds. Specifics on using Title I funds for early childhood education can be found in the Non-Regulatory Guidance. 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 4-year-old children whose family income does not exceed 160 percent of the federal poverty level, all 3 and 4-year-old children with disabilities, regardless of income, and other 4-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 as Title I funds cannot be used to fund preschools required by state law or local school board policy. Title I funds may be used to expand the existing required preschool programs.

Before Title I funds can be spent on a preschool, the LEA must first meet state requirements using non-federal dollars. Kentucky's requirements can accessed through the following links: Preschool Enrollment 2015-2016, Age Eligibility Requirement for Kentucky State-Funded Preschool, and Preschool Administrative Resources.

Standards for Preschool Programs

A district using Title I funds to provide preschool programs to low-income children not served by state-funded preschool 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 1302.

The Kentucky Early Childhood Standards document was designed to reflect the range of developmental abilities typical of young children, birth to 5 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.

If an LEA offers a public preschool education, it must meet all of the ESSA foster care requirements, including ensuring that a child in foster care remains in his/her preschool of origin, unless a determination is made that it is not in the child's best interest. The program must also meet, at a minimum, the education performance standards of the Head Start Program Performance Standards that are aligned with the Head Start Child Early Learning Outcomes Framework Ages Birth to Five (2015).

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.

A preschool that is part of a school operating a Title I Schoolwide Program (SWP) is not required to identify children as eligible to participate in the Title I preschool. All children in the attendance area of the school are eligible for preschool services.

A preschool that is part of a school operating a Title I Targeted Assistance Program (TAS) may serve preschool-age children who are 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. Family income may be used to determine eligibility for a Title I preschool, particularly for the purpose of prioritizing when Title I resources to serve all preschool-age children with other educational needs are insufficient. Children should not be identified for Title I preschool based solely on family income.

Some children are "automatically eligible" to participate in a Title I preschool program. Children who participated in a Head Start or a Title I preschool program at any time during the two preceding years, homeless preschool-age children, migrant education preschool-age children (Title I, Part C) and children in a local institution or attending a community day program for neglected or delinquent children and youth are automatically eligible for Title I preschool and to continue into Title I school programs.

Qualifications for Teachers and Paraeducators

Teachers working in Title I preschool programs in states that consider preschool as part of public elementary education (including Kentucky) must meet the applicable Title I teacher qualification requirements. Districts must hire teachers

with the Interdisciplinary Early Childhood Education (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.

The same rules and requirements listed in the paraeducator section of this handbook apply paraeducators working in a Title I preschool program. A paraeducator does not include individuals who have only non-instructional duties, such as providing personal care services or performing clerical duties.

Parental and Family Engagement

A child's literacy and cognitive development depend highly on the quality of family environment as well as parent-child interactions. Parent and family engagement 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. Preschool programs should provide explicit training for parents in the skills and behaviors that support their child's development.

All provisions of parent and family engagement that are required for Title I programs (both SWP and TAS) in Section 1116 are also requirements of a Title I funded preschool except ESSA 1116(d)(2)(A), the discussion of school-family compacts at parent-teacher conferences in elementary schools.

Transition from Preschool to Kindergarten

When a Title I preschool is funded at the district level, responsibilities must be established to assist children transitioning from preschool to elementary school programs. In its local Title I plan, a district must include how it will coordinate and collaborate with other programs such as Head Start, state-funded preschool, child care and special education.

A preschool that is part of a school operating a Title I SWP must assist children transitioning from early learning programs, such as Title I preschool, Head Start, state-funded preschool, child care, special education and other preschool programs, to kindergarten. The school must include a description of how it will assist preschool children in this transition in its comprehensive SWP.

A preschool that is part of a school operating a Title I TAS must coordinate and collaborate with the school's regular education program, which may include services to assist preschool children transitioning from early learning programs, such as Title I preschool, Head Start, state-funded preschool, child care, special education and other preschool programs, to kindergarten.

Suggested Documentation

It is recommended that you save the following items in the event of a monitoring visit. This is not meant to be an all-inclusive list, but rather provide guidance when it comes to documenting Title I funds used at the preschool level.

District Monitoring Checklist — Sample Preschool Documentation	
• Rosters of enrolled students and students on the waiting list.	☐
• Process for enrollment including screening results and other selection criteria (teacher/parental input).	☐
• Rank order list of students who are failing or most at risk of failing to meet Kentucky's student academic achievement standards (for preschools within a TAS).	☐
• Copy of curriculum, daily classroom schedules, sample lesson plans, sample child assessment documentation.	☐
• Samples of school communication to families (primary language), records of meetings, training sessions, etc.	☐
• The Title I plan detailing how funds are used for both preschool and transitioning children into kindergarten.	☐
• A detailed budget indicating all sources of preschool funding.	☐
• State laws and/or local policies regarding required preschool programs and the amount of nonfederal funding provided to meet those requirements.	☐
• A copy of the parent and family engagement policy and other documents dealing with parent and family engagement.	☐
• A copy of the process used for identifying eligible preschool students	☐
• Any documents involving the subcontracting of services (signed contracts, description of roles and responsibilities, etc.).	☐
• If funds are used to rent a private facility, maintain ample documentation that the space is necessary for the success of the program, the cost is reasonable, and that no other appropriate space is available.	☐

TITLE I AND CHILDREN IN FOSTER CARE

ESSA, Title I Part A, Sections 1111 & 1112

The Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA) emphasizes the educational stability of vulnerable students, including those in foster care. Children in foster care face many educational barriers, including traumatization, high mobility, and undiagnosed behavioral and health conditions. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the Non-Regulatory Guidance for Ensuring Educational Stability for Children in Foster Care, developed by the U.S. Department of Education (ED) and United States Department of Health and Human Services.

ESSA section 1111(g)(1)(E) provides new guidelines for ensuring the educational stability of children in foster care. Title I Part A of ESSA requires local educations agencies (LEAs) receiving Title I funds to collaborate with state or local child welfare agencies on local procedures for transportation for students in foster care. This must be accomplished by ensuring that transportation for children in foster care is provided, arranged, and funded. [ESSA 1112(c)(5)(B)]. An LEA must ensure that transportation provided for children in foster care is consistent with the procedures developed by the LEA in collaboration with the state or local child welfare agency under section 1112(c)(5)(B) of ESSA. These requirements apply whether or not the LEA already provides transportation of children who are not in foster care.

An LEA in collaboration with local child welfare agency (LCWA) must ensure that children in foster care needing transportation to the school of origin promptly receive such transportation in a cost-effective manner. [ESSA 1112(c)(5)(B)(i)]. Therefore, the LEA and the LCWA must provide or arrange for adequate and appropriate transportation to and from the school of origin while any disputes are being resolved.

For more information and resources on the education of children in foster care, visit KDE's Foster Care webpage.

HOMELESS EDUCATION

Title IX, Part A reauthorized under ESSA

The McKinney-Vento Homeless Assistance Act was the first and remains the only major federal legislative response to homelessness. The McKinney-Vento Act applies to children and youth age 21 and under, consistent with their eligibility for public education services under state and federal law (children between the ages of 3 and 21 in accordance with 20 U.S.C 1412(a)(1)(A)).

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 (ED) Non-Regulatory Guidance for the Education for Homeless Children and Youth Program. For more information on the education of homeless children and youth in Kentucky, visit KDE's Title IX, Part A - Education for Homeless Children and Youth webpage.

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 McKinney-Vento Homeless Education Program grants include the following school districts: Ashland Independent, Campbell County, Eminence Independent, Erlanger-Elsmere Independent, Fayette County, Greenup County, Henderson County, Jefferson County, Jessamine County, Knott County, Newport Independent, Paducah Independent, Pike County, Whitley County. The grants are awarded on a three-year cycle which began July 2015.

Definitions

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

Unaccompanied Homeless Youth: A youth not in the physical custody of a parent or guardian and experiencing homelessness. The National Center for Homeless Education's unaccompanied youth eligibility flowchart can provide guidance on determining status as an unaccompanied homeless student.

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; including preschools and feeder schools.

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 3-21 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
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. The district must set-aside monies on the Title I Application in GMAP for homeless students and describe the educational services for these students. Funds must be set aside even if no students in the district are currently identified as experiencing homelessness. 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 there are no students identified as homeless, funds should still be set-aside in the event that homeless students are identified during the school year.
2. The district's Title I, Part A application should also include a description of the method used for determining the amount reserved, whether by a needs assessment or some other method (e.g., past homeless student enrollment and support service cost data), and how the liaison was consulted or involved in determining the set-aside. There is not currently a formula for determining the appropriate amount for the homeless set-aside, but four commonly accepted methods are:
    - **Conduct a needs assessment in conjunction with local social services or shelters.** The homeless liaison can work with local homeless assistance agencies, shelters, etc. to determine the services

homeless children need and the appropriate amount to pay for them.

- **Obtain a count of homeless students and multiply the number by the LEA's Title I, Part A per-pupil allocation.** If surveying the school staff, it is crucial to ensure that staff understand the law's definition of homeless as well as prohibitions on segregating or stigmatizing homeless students.
- **Match or exceed the district's McKinney-Vento subgrant.**
- **Use a percentage based on district poverty level.** If using this method, the district is recommended to examine comparison data (such as student mobility rates) in order to better estimate the appropriate percentage.

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

TITLE I AND HOMELESS CHILDREN AND YOUTH

ESSA, Title I, Part A, Sections 1114, 1115, 1118

Homeless children and youth are to be provided services comparable to those received by other students. The Stewart B. McKinney-Vento Homeless Assistance Act was the first and remains the only federal legislative response to homelessness. The mission of KDE'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 following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (ED) Policy Guidance for Education for Homeless Children and Youth Program.

Key Provisions in Title I, Part A, Relating to Homelessness

- Removes "awaiting foster care placement" from the definition of homeless as of December 10, 2016.
- Expands the definition of "school of origin" to include preschool and feeder schools;
- Requires continued enrollment and transportation during any enrollment dispute pending final resolution of the dispute, including all available appeals;
- Expands transportation to the school of origin through the remainder of the school year in which the student becomes permanently housed;
- Requires that all State educational agencies (SEAs) and local educational agencies (LEAs) have policies to remove barriers to identification, enrollment and retention of children and youth who are homeless, including barriers to enrollment and retention due to outstanding fees or fines or absences;
- Requires SEAs to have procedures that ensure that students who are homeless and who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet schools, summer school, career and technical education, advanced placement courses, online learning and charter schools;
- Requires the State Plan describe how youth who are homeless will receive assistance from counselors to advise such youth and improve their readiness for college.
- Requires that the State Plan ensure appropriate access to secondary education including procedures to remove barriers that prevent youth from receiving appropriate for full or partial coursework completed while attending a prior school.
- Requires LEAs to immediately enroll children and youth who are homeless even if they have missed application and enrollment deadlines during any period of homeless.
- Allows LEA liaisons to refer students and their families to needed housing services and to affirm eligibility for students and their families for homeless assistance programs funded by the United States Department of Housing and Urban Development if the liaison has received training;
- Requires that information about a homeless child's living situation (e.g., homeless status, temporary address) be treated as a student education record and not be deemed to be directory information.
- 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 experiencing homelessness, 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 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.

Expanded Availability and Use of Title I, Part A Funds

Expanding the availability and use of Title I, Part A funds increases the resources for homeless students.

- The amount of Title I funds reserved for homeless children and youth may be determined based on a needs assessment and must be based on the total allocation received by the LEA and reserved prior to any allowable expenditure transfers by the LEA.
- Title I funds reserved for homeless children and youth may be used for services not ordinarily provided by Title I.
- Title I funds may be used for local liaisons and transportation to a student's school of origin.

Strategies for Serving Homeless Children and Youth and Title I, Part A

Two principles govern the use of Title I, Part A funds to provide services to homeless students:

1. The services must be reasonable and necessary (as outlined in 2 CFR 200.403(a)) to assist homeless students to take advantage of educational opportunities.
2. Title I, Part A funds must be used only as a last resort when funds or services are not available from other public or private sources, such as the USDA's National School Lunch Program and Breakfast Program, public health clinics, or local discretionary funds (sometimes provided by the PTA) used to provide similar services for economically disadvantaged students generally.

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. The LEA may use Title I, Part A funds to provide, where appropriate, items or services including, but not limited to –
    - Items of clothing, particularly if necessary to meet a school's dress or uniform requirement;
    - Clothing and shoes necessary to participate in physical education classes;
    - Student fees that are necessary to participate in the general education program;
    - Personal school supplies such as backpacks and notebooks;
    - Birth certificates necessary to enroll in school;
    - Immunizations;
    - Food;

    - Medical and dental services;
    - Eyeglasses and hearing aids;
    - Counseling services to address anxiety related to homelessness that is impeding learning;
    - Fees for AP and IB testing;
    - Fees for college entrance exams such as SAT or ACT; and
    - GED testing for school-age students
- Use Title I funds for parent and family engagement that makes a special effort to reach out to parents in homeless situations.
- Extended learning time (before and after school, Saturday classes, summer school) to compensate for lack of quiet time for homework in shelters or other overcrowded living conditions.
    - Tutoring services, especially in shelters or other locations where homeless students live
- 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 evidence 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 McKinney-Vento grant 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.

Collaboration and Coordination between Title I, Part A, and Homeless Education

Strategies to facilitate collaboration and coordination between Title I, Part A, and Homeless Education 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 parent and family engagement policies and create opportunities for homeless parents to be involved.

Suggested Documentation

It is recommended that you save the following items in the event of a monitoring visit. This is not meant to be an all-inclusive list, but rather provide guidance when it comes to documenting Title I funds used for homeless children and youth.

District Monitoring Checklist — Homeless Children and Youth Sample Documentation	
• Homeless Education posters displayed in schools and district office (download posters in English and Spanish from the National Center for Homeless Education)	☐
• Proof that the district has effectively communicated the existence of the homeless liaison (student handbook information, fliers, newspaper postings/articles, etc.)	☐
• Annual homeless count data	☐
• District policy on identifying homeless families	☐
• Sign-in sheets and minutes on related trainings	☐
• Proof that homeless children and their families receive education services for which they are eligible (information provided to families, referrals from FRYSC)	☐
• Documentation of transportation assistance	☐
• Written statement of school placement decision and the appeal rights	☐
• District enrollment policies	☐
• District set-aside in GMAP for homeless children and youth (including a description of the educational services provided)	☐

Websites Addressing Homelessness

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

Corporation for Supportive Housing
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.

Kentucky Department of Education McKinney-Vento Homeless Assistance Act Subtitle VII-B
This site provides specifics regarding the education of children and youth experiencing homelessness in the state of Kentucky.

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

The National Association for the Education of Homeless Children and Youth **(NAEHCY)**
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.

National Center for Homeless Education **(NCHE)**
Funded by the U.S. Department of Education, NCHE operates the Department's technical assistance center for the federal Education for Homeless Children and Youth (EHCY) Program. NCHE works with schools, service providers, parents, and other interested shareholders to ensure that children and youth experiencing homelessness can enroll and succeed in school.

National Health Care for the Homeless Council
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
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.

SchoolHouse Connection
This site includes key legal requirements for McKinney-Vento liaisons while promoting educational success for children and youth homelessness from early childhood all the way up to post-secondary

Technical Assistance Collaborative
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.

U.S. Interagency Council on Homelessness
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.

LOCAL INSTITUTIONS FOR NEGLECTED & DELINQUENT CHILDREN

ESSA Title I, Part A, Section 1113

A district must provide for the educational needs of children in identified local institutions for neglected children. See Appendix Y for the list of facilities for neglected and delinquent children and the caseload for each facility. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (ED) Non-Regulatory Guidance for Neglected, Delinquent, or At-Risk Children. Visit KDE's Title I, Part D webpage for more information on services for neglected and delinquent children.

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.

Funding Institutions for Neglected and Delinquent Children

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.

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.

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 district set-asides section of the Title I Application in GMAP must contain a brief description of Title I educational services for children in locally operated institutions for neglected and delinquent 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 to provide students with additional assistance. The books and materials cannot be religiously affiliated.

Religiously Affiliated Institutions

It is allowable for Title I personnel to go on the property to provide Title I educational services.

Evaluation

There is no separate evaluation for children in local institutions for neglected children for Title I accountability purposes.

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 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.

Suggested Documentation

It is recommended that you save the following items in the event of a monitoring visit. This is not meant to be an all-inclusive list, but rather provide guidance when it comes to documenting Title I funds used for children in neglected and delinquent facilities.

District Monitoring Checklist — Local Institutions for Neglected & Delinquent Children Sample Documentation	
• Annual survey of Children in Local Institutions for Neglected or Delinquent Children	☐
• Documentation of children attending the facility	☐
• Attendance data for children that have been in the facility for at least one day in October	☐
• Proof of consultation with institution officials regarding Title I services	☐

TITLE I AND TITLE III

ESSA Sections 1111, 1112, 1114

Title III of the Elementary and Secondary Education Act (ESEA) is part of legislation enacted to ensure that English Learners (ELs), including immigrant children and youth, develop English proficiency and meet the same academic content and academic achievement standards that other children are expected to meet. For more information on Title III, consult ED's Non-Regulatory Guidance: English Learners and Title III of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA) as well as KDE's English Learners webpage.

The Every Student Succeeds Act (ESSA) amendments to ESEA include the transfer of some of the requirements under Title III to Title I. The purpose of this section is to clarify the areas that have transferred from Title III to Title I, as well as identify areas of overlap between the two programs.

ESSA 1114	An LEA may consolidate its Title III funds in a schoolwide program pursuant to the requirements in section 1114(a) of ESSA. This would ease requirements that the LEA must maintain separate fiscal accounting records and instead must only maintain records that demonstrate that the schoolwide program, considered as a whole, addresses the intent and purpose of each federal program that has been consolidated.
ESSA 1114(a)(2)(B)	In a school that decides to consolidate Title III funds with Title I, the Title III supplement-not-supplant provision would no longer apply. Instead, the non-supplanting provision in section 1114(a)(2)(B) of ESSA would apply. This would require LEAs to ensure that each schoolwide program receives funds from non-Federal sources to provide services that are required by law for students with disabilities and ELs before using Title I funds in that school.
ESSA 1112(e)(3)(C)	ESSA now requires that each LEA that receives a Title I subgrant must implement an effective means of outreach to parents of ELs. The outreach must include holding, and sending notice of opportunities for, regular meetings in order to gather and respond to recommendations from parents.
ESSA 1112(e)(3) **ESSA 1112(e)(3)(A)**	ESSA now requires that every LEA that uses funds under either Title I or Title III for services to ELs must provide a parent with notification that outlines their child's identification as an EL and placement in an LIEP. **The parental notification must include:** • The reason for identification of the child as an EL; • The child's level of English language proficiency, how the level was assessed, and the status of the child's academic achievement; • Methods of instruction used in the program in which the child is, or will be, participating, and the methods of instruction used in other available programs, including how the programs differ;

	• How the program will meet the educational strengths and needs of the child and help the child achieve English language proficiency, and meet academic standards; • Exit requirements for the program, expected rate of transition to a classroom not tailored for EL students, and expected rate of high school graduation; • In the case of a child with a disability, how the program meets the annual goals in the child's individualized education program (IEP); and • Information regarding parents' right to withdraw the child from a program upon their request, and to decline enrollment or choose another program or method of instruction, if available.
ESSA 1112(e)(3)(A) **ESSA 1112(e)(3)(B)**	The above notification must be provided no later than 30 calendar days after the beginning of the school year or within the first two weeks of placement in an LIEP for students who enroll after the start of the school year.
ESSA 1112(e)(4)	The above notification must be provided in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand.

Accountability Items that Moved to Title I

ESSA 1111(b)(2)(G) **ESSA 1111(c)(4)(A)** **ESSA 1111(c)(4)(B)** **ESSA 1111(c)(4)(C)** **ESSA 1111(c)(4)(D)** **ESSA 1111(h)(2)**	• Alignment of English language proficiency assessments to English language proficiency standards. • Establishment of English language proficiency goals and indicators for accountability purpose. • Identification of interventions to address ELs' academic achievement and progress in attaining English language proficiency. • Reporting to the State on the number and percentage of ELs achieving English language proficiency.

SCHOOL COUNCILS AND TITLE I

School councils and district administrators must work together to help disadvantaged children reach high academic standards. Holding schools, school councils, local educational agencies and states accountable for improving the academic achievement of all students is one way to accomplish this goal. Visit KDE's School-Based Decision Making webpage for more information on SBDM councils.

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

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, advise school councils on Title I laws and regulations, monitor all Title I programs to ensure compliance and the implementation of highly effective programs. The coordinator and the school council must work closely in the administration of the school's Title I program, therefore it is recommended that the coordinator attend a school council meeting to discuss the school allocation.

The Every Student Succeeds Act (ESSA) 1114(b)(6) 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. The Title I Program is integrated into the Comprehensive School Improvement Plan (CSIP). District-level program coordinators should be a part of the team that reviews the CSIP for compliance and effectiveness. The CSIP is then subject to approval by the school council. While all of the components of an SWP or a TAS may not be written into the CSIP, they must be a part of the overall program design.

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 (e.g., 4 math teachers, 2 reading teachers) 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.

TIME AND EFFORT – PERSONNEL PAID FROM TITLE I

Employees whose compensation is supported with Title I funds (or any federal funding source) must maintain appropriate records demonstrating the amount of time they worked on Title I. This applies to staff at the district and school level paid completely or partially from Title I funds. These records are often referred to as "time and effort" records.

Any federal cost, including salaries, must be allocable; that is, provide a benefit to the program that is proportionate to the relative benefits received. Federal funds can only pay for goods or services to the extent there is a chargeable benefit to the federal program. As an example, consider a school operating targeted assistance program (TAS). The school plans to set up a computer lab that will be used by Title I students 50 percent of the time and used by all students for the remaining 50 percent. Title I funds may only pay for 50 percent of the cost of the computer lab and the program must maintain records documenting, at a minimum, the total cost of the computer lab, the amount paid by Title I and other sources, and that the actual use of the computer lab by the Title I program was actually 50 percent of the time the lab was used.

2 C.F.R. 200.430 states that the salaries and wages of employees who work on federal programs may be paid with federal funds as long as appropriate time distribution records are maintained. These records must:

- Be supported by a system of internal controls that provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100 percent of compensated activities;
- Encompass both federally assisted and all other activities compensated by the district on an integrated basis;
- Comply with the established accounting policies and practices of the nonfederal entity; and
- Support the distribution of the employee's salary or wages among specific activities or costs objectives.

The frequency of reporting depends on whether an employee works on a single "cost objective" or multiple "cost objectives." A cost objective refers to a federal program, mandated set-aside, statutory cap, or reservation of funds to which a grantee is required to track its funds. Each federal and non-federal program represents a separate cost objective; Title I, Part A is one cost objective and Title I, Part C is another cost objective. There are also separate cost objectives within Title I, Part A for program services, administration, and family engagement.

Personnel Working with One Cost Objective

- 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. This is referred to as "semi-annual certification."
- 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.

Sample semi-annual certification:

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 Cost Objective

- District personnel working with more than one federal program (or combination of federal and nonfederal programs) must maintain monthly Personal Activity Report (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. See Appendix Z for a PAR template.

Sample Completed PAR:

PERSONAL ACTIVITY REPORT (PAR)
for District Personnel Working with More than 1 Program

Employee Name: John Smith | Month: September 2017

Reporting Period	PROGRAM	PROGRAM	PROGRAM	TOTAL HRS PER DAY	Reporting Period	PROGRAM	PROGRAM	PROGRAM	TOTAL HRS PER DAY
Day of Month	Title I, Part A	Title I, Part C			Day of Month	Title I, Part A	Title I, Part C		
1	2	5		7	16				
2					17				
3					18	2	5		7
4					19	2	5		7
5	3	5		8	20	1	5		6
6	1.5	5		6.5	21	1	5		6
7	2	5		7	22		5		5
8		5		8	23				
9					24				
10					25	3	5		8
11	1	5		6	26	1	5		6
12	3	5		8	27	2	5		7
13	2.5	5		7.5	28	3	5		8
14		5		5	29	3	5		8
15	3	5		8	30				
					31				
TOTALS 1-15	18	50		68	TOTALS 16-31	18	50		68

This certifies that the employee has completed work during the time period for the federal programs as indicated.

Employee Signature: *John Smith* | **Supervisor Signature:** *Jane Doe*

Substitute System for Personal Activity Reports

Maintaining a monthly PAR has proved difficult and time-consuming for many employees in previous years. In September 2012, the U.S. Department of Education (ED) released guidance that permits a state educational agency (SEA) to approve a local educational agency's (LEA) substitute system for time and effort reporting that meets the elements outlined in the guidance. This guidance permits an employee working on multiple cost objectives to complete a semi-annual certification submitted along with an acceptable work schedule instead of a monthly PAR. In order for an

employee working on more than one cost objective to be eligible to complete a semi-annual certification rather than a PAR, the following conditions must be met:

1. The employee works a schedule that includes multiple cost objectives;
2. The work on those multiple cost objectives is "predetermined" (i.e., a teacher's lesson plan);
3. The employee is not permitted to work on different cost objectives at the exact same time on their schedule; and
4. The documentation of the employee's schedule (which is used in lieu of the PAR) must:
    a. Indicate the specific activity or cost objective that the employee worked on for each segment of the employee's schedule;
    b. Account for the total hours for which the employee is compensated during the period reflected on the employee's schedule;
    c. Be certified at least semi-annually and signed by the employee and a supervisory official having firsthand knowledge of the work performed by the employee;
    d. Include documentation and certifications for any revisions to an employee's established schedule that continue for a prolonged period with effective dates clearly indicated; and
    e. Include documentation by the employee using a PAR that covers any periods for which significant deviations occur from the established schedule that require work on multiple activities or cost objectives at the same time.

If an employee working on multiple cost objectives is unable to meet these conditions, the employee must maintain a monthly PAR. In order for the LEA to use this alternate time and effort documentation, they must receive prior approval from the SEA.

Time and Effort Records with Consolidated Funds

The main question concerning employees working in schoolwide programs in which funds have been consolidated (under ESSA 1114(a)(3)) is whether these employees are working on one cost objective or multiple cost objectives.

- **If federal funds are consolidated with nonfederal funds**, the federal funds lose their identity as federal dollars. In this situation there is no distinction between staff paid with federal funds and staff paid with state or local funds. Employees paid with consolidated funds are not required to file semi-annual certification or any other form of time and effort records (such as PARs).
- **If federal funds are not consolidated with nonfederal funds**, time and effort documentation must be maintained. This applies to districts which do not consolidate any funds as well as districts which consolidate federal funds separate from nonfederal funds. Employees in either of these situations are required to complete either semi-annual certifications (employees working on one cost objective) or PARs (employees working on multiple cost objectives).

For more information, see question E-17 of ED's 2008 Title I Fiscal Issues Non-Regulatory Guidance.

Reference:

Manasevit, L.M., ESq., Winters Kesslar, T., Esq., & Tosh Cowan, K., Esq. (2016). *ESSA Moving Toward a Well-Rounded Title I* (United States, LRP Publications). Palm Beach Gardens, FL: LRP Publications

Appendix A – Title I Coordinator's Year-at-a-Glance	
August	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Review and update student selection criteria sheet and student selection procedure for TAS programs.	
• Submit final financial report to GMAP	
• Review and update parent/guardian notification materials (Accountability Statues, right-to-know letters, etc.). Distribute no later than the beginning of the school year.	
• Consult with LEA staff on comparability requirements (list of Title I vs. non-Title I).	
• Review and revise parent and family engagement policies and/or plans in consultation with parents.	
• Develop a system to collect and organize documentation related to the district's Title I program for state monitoring reviews.	
• Update contact information with SEA, if needed.	
• Send parental notification for Parents' Right to Know.	
September	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Distribute District and School Report Cards. This should be done at the beginning of the school year, no later than October.	
• Collect school schedules of annual fall parent orientation meetings. These meetings should be conducted by the end of October.	
• Review and update Title I personnel lists for each building.	
• Review and update parent/guardian notification of parents' right-to-know (send by October).	
• Identify data collection method for comparability calculations.	
• Establish a process for ongoing collaboration with the local homeless liaison for identifying homeless student needs and services as appropriate.	
• Consult with participating facilities for neglected and delinquent youth to develop an evaluation of services.	
• Ensure that all applicable parent notifications have been disseminated by direct and indirect means.	
• Ensure that all schools have Title I plans (e.g., school improvement plans) aligned to use of funds.	
October	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Initiate planning process for new SWPs, if applicable.	
• Design evaluations for Title I funded parent and family engagement plans as well as professional development activities for impact on student learning.	
• Collect and submit headcount data for student participation, Title I-A private school participation and Title I-D neglected and delinquent programs on GMAP.	
• Submit requests to amend budgets, as needed.	
• Calculate comparability based on October data and make appropriate adjustments to Title I schools shown to be non-comparable.	
• Review and update needs assessment and program evaluation procedures, as needed.	
• Review and update school improvement plans for Title I schools with accountability status, if applicable.	
• Send parent/guardian notification of Parents' right-to-know.	
• Conduct annual Title I meeting and collect evidence of the meeting.	
November	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Determine which month LEA collects ESSR data (total # enrolled and total # low-income). NOTE: Direct Certification data is collected on April 1. Free/Reduced lunch data may be collected from any month within same year.	
• Ensure Title I schools have created rank-ordered student selection lists of Title I students in TAS programs.	

• Ensure schools have documented the distribution of school-family compacts (e.g., copies of signed compacts, signatures of parents who have received the compact).	
• Review and revise SWP plan or TAS program plan, as needed.	
• Monitor dissemination of LEA parent and family engagement policy and school-parent and family engagement plans.	
• Submit requests to amend grants, as needed.	
• Submit Comparability Report on GMAP.	
• Ensure Title I schools with TAS programs have set up files, notified parents, and implemented services.	
December	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Submit requests to amend grants, as needed.	
• Monitor implementation of parent and family engagement plans.	
• Ensure that methodology regarding supplement not supplant is on file at the district.	
January	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Submit requests to amend grants, as needed.	
• Collect semi-annual certifications (1 of 2) for Title I personnel whose compensation is funded solely from Title I and for personnel using the substitute time and effort system.	
• Establish a plan and timeline for working with other federal programs in the district to coordinate the consolidated application in the next year.	
February	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Submit requests to amend grants, as needed.	
• Coordinate with early childhood programs to plan transition of preschool students.	
• Consult with appropriate LEA staff on comparability requirements (e.g., staff assignments, staff/student rations, and per pupil expenditures) for the next school year.	
• Determine roles, responsibilities, and timeline of appropriate LEA representatives to determine comparability requirements.	
March	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Submit requests to amend grants, as needed.	
• Use available data (e.g., economically disadvantaged, other low-income data, or a combination of poverty indicators) to determine eligible schools for Title I services (for next school year)	
• Meet with school principals to collect information on use of funds to support Title I programs for the next funding application.	
April	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Submit requests to amend grants, as needed.	
• Consult with the local homeless liaison to determine number of homeless students and amount of reservation of Title I funds.	
• Consult with eligible private schools and obtain affirmation of consultation with participating private school officials.	
• Consult with local early childhood shareholders (Exceptional Children, Pre-K, Head Start, etc.) to coordinate early childhood services (Title I Pre-K) as appropriate.	
• Conduct other shareholder consultations on the development of the LEA/school Title I plan. Shareholders include parents/families, private schools, homeless education programs, migrant education programs, English learner programs, school leadership teams.	
• Submit applicable data on GMAP (e.g., TAS, SIG, participating schools)	
• Coordinate services with local neglected or delinquent facilities, if applicable.	
May	

• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Submit requests to amend grants, as needed.	
• Conduct program evaluation and develop a summary of the results.	
• Conduct needs assessment based on findings of program evaluation.	
• Determine roles and responsibilities of appropriate LEA representatives to determine comparability requirements.	
• Meet with district financial staff to reconcile fiscal issues prior to the end-of-year closeout.	
• Finalize plan and budget and submit Title I application on GMAP	
• Ensure that the Title I status of all schools in Infinite Campus matches the Title I status in GMAP. Targeted Assistance Schools must report services provided to students on the "State" tab. This must be done before the Kentucky Department of Education data pull on July 1.	
June	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Submit requests to amend grants, as needed.	
• Review and update supplement, not supplant procedure, if needed.	
• Review and update district parent and family engagement policy based on data (e.g., evaluations).	
• Determine calculation methodology for comparability requirements.	
• Finalize plan, budget and submit Title I application on GMAP by June 30 (unless an extension is required).	
• Review and update school-family compact.	
July	
• Collect signed Time and Effort records for staff who work on multiple cost objectives.	
• Submit requests to amend grants, as needed.	
• Submit waivers for excess carryover limitation (15%) to be reviewed by KDE.	
• Review and update school-family compact.	
• Collect semi-annual certifications (2 of 2) for Title I personnel whose compensation is funded solely from Title I and for personnel using the substitute time and effort system.	
Ongoing	
• Engage in family and community involvement. Maintain documentation of these activities (meeting agendas and notes, meeting notifications, sign-in sheets, etc.).	
• Review and update school parent and family engagement policy based on data (e.g., evaluations).	
• Review and update school–family compact.	
• Title I director ensures funds for non-public schools are being spent in an appropriate manner (e.g. non-public school receives approval before spending funds, expenses are allowable)	
• Attend information sessions and professional development activities to stay current on best policies, practices, and research.	
• Collect, analyze and synthesize comprehensive needs assessment data.	
• Submit budget and budget amendments on GMAP budgeting system as needed.	
• Regularly verify the financial status of Title I programs (e.g., approved allocation to participating schools, appropriate expenditure of current year's funds, ensuring Year 2 funds are spent, etc.).	
• Implement jointly developed school-family compact that outlines how families, the entire school staff, and students will share the responsibility for improved student achievement, and the means by which the school and families will build and develop a partnership to help children achieve the state's high standards.	
• Notify parents/guardians when their child has been assigned or has been taught for four or more consecutive weeks by a teacher who is not highly qualified, if applicable.	
• Ensure funds for non-public schools are being spent in an appropriate manner (e.g., non-public school receives approval before spending funds, expenses are allowable).	
• Conduct ongoing communication to participating private schools and oversight of services provided to eligible private school students and teachers.	
• Collect and submit applicable data in GMAP.	

Appendix B – Annual Review of Schoolwide Program and Title I Annual Review

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 academic content standards and student achievement 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.

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 shareholders, the degree of parent and family engagement, and other elements that support increased student achievement, as detailed in the schoolwide program plan.

The intended audience for the annual review is all shareholders, internal and external to the school. These shareholders 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 shareholders include:

- Those involved in day-to-day program operations, such as teaching, administrative and school support staff;
- Those served by the program, such as students, parents and community members;
- 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.

The Kentucky Department of Education (KDE) uses the Title I Annual Review, provided on the following page, for the purpose of reviewing schoolwide programs. The Title I Annual Review can be found in eProve. The document will be open for completion beginning October 1 and should be submitted no later than November 1. For more information and guidance on eProve, see KDE's Comprehensive Improvement Planning for Schools and Districts webpage and eProve Diagnostics Quick Reference Card.

Title I Annual Review

Overview:

Upon receiving data from the previous year's state assessment in mid-September to early-October, schools must conduct a thorough review of its Title I Schoolwide Program in accordance with federal law. 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.

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.

Use the rationale and guiding questions to articulate a succinct, but thorough response to each of the 8 Components of a Schoolwide Program.

Component 1: Comprehensive Needs Assessment

Rationale: A school's Needs Assessment should address critical areas for improvement and identify strengths based on a thorough review of multiple sources of data. Title I funding does not have to address all areas identified in the Needs Assessment because federal, state and local resources are integrated into a schoolwide program, but Title I funds should supplement critical areas of need.

Guiding Questions:

- *Which data sources did the school use to conduct its Needs Assessment?*
- *What needs did the data identify?*
- *What specific grade levels and/or content areas were identified as priority?*
- *What achievement gaps were identified?*
- *Specifically, how were Title I funds used to address priorities outlined in the Needs Assessment?*
- *Based on a thorough review of multiple sources of data, how effective was the expenditure of Title I funding used to target critical needs?*

Component 2: Schoolwide Reform Strategies

Rationale: Schoolwide reform strategies addressed in the schoolwide program plan (ie: CSIP) address goals and objectives to be met through a variety of strategies and activities during the course of a single school year. A school must carefully plan, implement and measure its progress towards the attainment of measurable student achievement goals.

Guiding Questions:

- *Was the schoolwide plan implemented as written?*
- *Which goal(s) from the comprehensive school improvement plan (CSIP) address Schoolwide Reform Strategies?*
- *How is Title I funding being directed to address the goal?*

- *How were strategies selected to address goals based on research, evidence and evaluation of past implementation?*
- *Which activities, strategies, staffing decisions, professional development opportunities and resources were supported with Title I funds?*
- *Were the activities, strategies, staffing decisions, professional development opportunities and resources effective in increasing student achievement?*

Component 3: Professional Development

Rationale: Professional Development (PD) opportunities should be carefully planned to improve instruction related to priorities specified in the Needs Assessment.

Guiding Questions:

- *What measures were used to determine the school's PD needs?*
- *How was the PD tied to the school's identified need?*
- *Did the PD improve instruction based on a thorough review of student achievement data?*
- *How were 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?*

Component 4: Family Engagement

Rationale: Each school is required to conduct outreach to all parents and family members which may include implementation of the following: programs, activities and procedures that involve parents and family member in Title I programs. In addition, written policies must be developed in collaboration with parents outlining expectations and objectives for meaningful parent and family engagement.

Guiding Questions:

- *How much Title I money was spent on family engagement?*
- *What kind of programs, activities and procedures were planned?*
- *What was the outcome or effectiveness of the planned family engagement programs, activities and procedures?*

Component 5: Transitions (to Pre-School and other grade levels)

Guiding Questions

- *How did school and district administrators collaborate through funded programs such as Head Start?*
- *What were the specific strategies used for helping students transition from preschool to elementary school, elementary school to middle school or middle school to high school?*
- *How effective were these strategies?*

Component 6: Measures used to include teachers in decisions

Guiding Questions:

- *How were all teachers included in the selection of academic assessments?*
- *How did teachers participate in the analysis of data and the development of the overall instructional program in order to improve student achievement?*

Component 7: Activities used to ensure students met common core standards

Guiding Questions:

- *How did the school provide effective, timely and additional intervention to students in danger of not meeting state standards?*
- *How were students and their needs identified for assistance?*
- *How did teachers and paraeducators collaborate for planning and instruction?*
- *How were the activities specified in the CSIP monitored regularly for effectiveness?*
- *Which activities were deemed successful and which ones are in need of change?*

Component 8: Coordination and integration of programs

Guiding Questions:

- *Which federal, state and local funds were made available to the school?*
- *How did the school coordinate and integrate federal, state and local programs and services to improve instruction and increase student achievement?*
- *What measures were taken to ensure that Title I, Part A funds were used to supplement, not supplant existing resources, programs, and staffing needs?*

Title I Spending Review:

Goal/Objective	Amount of Title I Funding Used	Strategy, Activity, Program, Staffing or other resource	Data used to determine effectiveness	Effective: Yes/No/Unclear?

Appendix C – Rubric to Assess the Quality of SWP

The following model was adapted from a rubric developed by the Iowa Department of Education 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.

Comprehensive Needs Assessment		
Exceptional — ★★★	Acceptable — ★★	Needs Revision — ★
Includes a variety of data gathered from multiple sources.	Includes data gathered from two sources.	Includes data gathered from less than two sources.
Examines student, teacher, school, and community strengths and needs.	Examines student strengths and needs.	Examines student deficits.
School Reform Strategies		
Exceptional — ★★★	Acceptable — ★★	Needs Revision — ★
Strategies increase the quality and quantity of instruction, using evidence-based methods and strategies.	Increased the quality and quantity of instruction.	Increases neither the quality nor quantity of instruction.
Evidence-based reform strategies are directly aligned with the findings of the needs assessment.	Reform strategies aligned with the findings of the needs assessment.	Reform strategies are not directly aligned with the comprehensive needs assessment findings and do not reference evidence-based models.
Provides a detailed, enriched, and accelerated curriculum for all students.	Provides an enriched and accelerated curriculum for select students with plans in place to move toward all students.	Provides a basic curriculum.
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 student populations participating in the schoolwide program.	Addresses the needs of all children in the school, but particularly the needs of students of target populations participating in the schoolwide program.	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.
Addresses specific strategies that assist teachers in determining if student needs are met.	Briefly addresses how the school will determine if these needs are met.	Teachers are directed to meet student needs without specific strategies or approaches.
High-Quality and Ongoing Professional Development		
Exceptional — ★★★	Acceptable — ★★	Needs Revision — ★
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.	Most staff receives training toward meeting the needs of only select groups of students.	Some staff receives fragmented training unrelated to identified school needs.
All staff receives ongoing and sustained professional development that is aligned with the goals of the school improvement plan.	Most staff receives ongoing and sustained professional development that is mostly aligned with the goals of the school improvement plan.	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 Parent and Family Engagement		
Exceptional — ★★★	Acceptable — ★★	Needs Revision — ★
Specific strategies to increase parent and family engagement, based upon results of the needs assessment have been identified and implemented.	Specific strategies to increase parent and family engagement have been identified and implemented.	Specific strategies to increase parent and family engagement have not been identified or implemented.

Strong collaboration with community resources is evident.	Some collaboration with community resources is evident.	No collaboration with community resources is observed.
Parents are included as decision makers in a broad spectrum of school decisions.	Parents are included as decision makers in a limited number of school decisions.	Parents have no role in the decision making process of the school.
Collaboration is evident between the elementary school and preschool programs (i.e. state funded preschool, Head Start).	Collaboration efforts have begun between the elementary and preschool programs.	Collaboration and communication seldom occurs between the regular elementary school program and preschool programs.
Specific strategies for helping students' transition into the elementary setting have been identified and implemented.	Specific strategies for helping students' transition into the elementary setting are not included in the school improvement plan.	Specific strategies for helping students' transition into the elementary setting have not been identified or implemented.
Teacher Participation in Making Assessment Decisions		
Exceptional — ★★★	Acceptable — ★★	Needs Revision — ★
A team of teachers, administrators, and parents participate in the selection, use, and interpretation of school-based assessments.	Student performance is considered when modifying the school improvement plan.	Assessment decisions are made with little or no input from teaching staff.
Student performance drives modifications and improvements in the selection and use of school-based assessments.	Student performance is considered when modifying the plan; however, it does not always occur.	Student performance is not considered when making decisions about assessment.
Timely and Additional Assistance to Students Having Difficulty Mastering the Standards		
Exceptional — ★★★	Acceptable — ★★	Needs Revision — ★
The school has a well-defined process that is currently being implemented to identify students experiencing difficulty mastering the state's standards.	The school has a process in place to identify students experiencing difficulty mastering the state's standards.	No process is in place to identify students experiencing difficulty mastering the state's standards.
Timely, effective, and additional assistance is provided for students experiencing difficulty mastering the state's standards.	Effective, and additional assistance is provided for students experiencing difficulty meeting the state's standards.	Additional assistance is sometimes provided to some students who are experiencing difficulty, but the intervention is not regular and ongoing.
Thematic, integrated instruction, designed to accommodate the needs of various learning styles is provided.	Students receive some differentiated instruction while working with support staff.	All students are taught using the same methods.
Coordination and Integration of Federal, State, and Local Programs and Resources		
Exceptional — ★★★	Acceptable — ★★	Needs Revision — ★
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 the goals.

Appendix D —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.
    - A 30-60-90 day plan is the recommended tool for organizing the responsibilities and timelines of a year-long comprehensive plan. A 30-60-90 day plan is a written outline of your strategy, broken down in 30 day increments. The 30-60-90 day model allows a team to break a plan down into manageable pieces. These plans also provide a level of accountability to projects by assigning tasks to individual group members.
- 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.

For more information and resources related to continuous improvement, visit KDE's Comprehensive Improvement Planning for Schools and Districts webpage.

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

Name of School:
Title I Focus Content Area:

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

NAME	AGE/GRADE	NAME	AGE/GRADE

Infinite Campus resource for Title I Data Standards

Appendix F – 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 ranking scale:

- 1 – very low
- 2 – low
- 3 – low average
- 4 – average
- 5 – above average

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

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

Appendix G – 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 ranking scale:

- 1 – very low
- 2 – low
- 3 – low average
- 4 – average
- 5 – above average

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

Other criteria such as diagnostic tests may be added.

Appendix H — Resources to Improve Parent and Family Engagement

1. Appalachia Regional Comprehensive Center Offering resources on ESSA for policymakers and practitioners.
2. ¡Colorín colorado! A bilingual site featuring information, activities and advice for educators and families of English language learners (WETA-TV)
3. Family and Community Engagement (ED)
4. Dual Capacity-Building Framework for Family-School Partnerships (ED)
5. EDPubs Order free U.S. Department of Education publications (ED)
6. 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.
7. Giving Parents Options: Strategies for Informing Parents and Implementing Public School Choice And Supplemental Educational Services Under No Child Left Behind (ED)
8. Governor's Commonwealth Institute for Parent Leadership (Prichard Committee for Academic Excellence)
9. Harvard Family Research Project Shaping 21st-century learning opportunities so that all children and youth thrive.
10. Kentucky Parent Information & Resource Centers Providing local, regional, and statewide support for parents to enhance their involvement in their children's education by implementing effective parent and family engagement policies, programs and activities that will improve children's academic achievement.
11. Kyle, D., McIntyre, E., Miller, K., Moore, G. (2002). *Reaching Out: A K-8 Resource for Connecting Families and Schools*. Corwin Press, Inc.
12. Parent and Family Involvement in Education, from the National Household Education Surveys Program of 2012 (Institute of Education Sciences – National Center for Education Statistics)
13. National Center for Family and Community Connections with Schools Supporting school, family, and community connections to increase school success. (American Institutes for Research)
14. National Center for Family Literacy NCFL exists to create a culture of family engagement across the educational spectrum.
15. National PIRC Coordination Center (ED) A technical assistance project serving Parental Information and Resource Centers (PIRCs). Webinar series *Achieving Excellence and Innovation in Family, School, and Community Engagement*.
16. The Missing Piece of the Proficiency Puzzle Recommendations for involving families and community in improving student achievement. (KDE)
17. The Education Trust Fierce advocates for the high academic achievement of all students — particularly those of color or living in poverty.
18. Prichard Committee for Academic Excellence To provide a public voice advocating for continually improved education for all Kentuckians.
19. The "What Works Clearinghouse" (WWC) Providing educators with the information they need to make evidence-based decisions. (Institute of Education Sciences: National Center for Education Evaluation and Regional Assistance.

Appendix I — Effective District Parent and Family Engagement Policy Checklist

Effective District Parent and Family Engagement Policy Checklist	
• The policy must be reviewed by the district to determine that it meets parent and family engagement requirements outlined in Section 1116(a)(2) of the Every Student Succeeds Act (ESSA).	☐
• The policy must 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.	☐
• The district has documentation supporting its fulfillment of the requirements listed below. ○ Documentation could include agendas from parent meetings or trainings and comments from parents.	☐
• The district's written policy must describe specifically how the district will complete the requirements listed below.	☐
Involve parents in the joint development of the Title I plan and in the process of school review and improvement	
• The policy is developed jointly and agreed upon by parents of participating Title I students through meaningful consideration.	☐
• The policy describes how parents of participating Title I students will be involved in deciding the ways in which parent and family engagement funds are used.	☐
• The policy is shared at the district board meeting as evidenced by the meeting minutes.	☐
Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent and family engagement activities to improve student academic achievement and school performance	
• The policy describes how the district enables parents to participate in school-related meetings, trainings and parent and family engagement activities by providing transportation and childcare when needed.	☐
• The policy describes how the district offers meetings at a variety of times and locations to encourage parent and family engagement.	☐
• The policy describes how parents are involved in the development of training for staff to improve the effectiveness of the training	☐
Build the capabilities of schools and parents to ensure strong parent and family engagement	
• The policy establishes the expectations for parent and family engagement.	☐
• The policy explains how parents are informed about school meetings and events in a language they can understand.	☐
• The policy describes how staff will be trained to reach out to, communicate and work with parents as equal partners in their children's education.	☐
• The policy explains how parents are assisted in understanding Kentucky's assessment and their child's performance.	☐
• The policy establishes how training and materials are provided to parents to help their children's achievement.	☐
• The policy describes how the district will adopt and implement model approaches to improve parent and family engagement and provide support for involvement as requested by parents.	☐
• The policy explains how the district will coordinate and integrate Title I parent and family engagement strategies with those under other programs, such as Head Start, Parents as Teachers, Home Instruction Programs for Preschool Youngsters, and State-run preschool programs.	☐
• (Optional) The policy explains how the district will establish a districtwide parent advisory council and involve community organizations and businesses in parent and family engagement activities.	☐
• The policy is distributed to parents.	☐
Involve parents in an annual evaluation of the content and effectiveness of the parent and family engagement policy by assessing how much parent participation has increased and identifying barriers to parent participation which need to be addressed	
• The policy states how the district provides full opportunity for the participation of parents with limited English proficiency or with disabilities.	☐
• The policy describes how findings from the annual evaluation are used to design strategies for school improvement and to revise the district parent and family engagement policy.	☐

Appendix J – Title I Program Parent Survey (1)

Please customize this 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 my 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
   _____ Receiving individualized help in a small group or one-on-one setting
   _____ Other (Explain) _____

   Comments_____

6. What does your child dislike about the Title I program?

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 school 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 DVDs with activity books
_____ Take home activities to do on a computer
_____ Attend parent and family engagement 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 K – Title I Program Parent Survey (2)

Please customize this letter with district letterhead. Personalize to include district specific or additional 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 L — Annual Parent and Family Engagement 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 SWP or TAS. This sample has combined issues for both programs.

Dear Parents:

Your child has been a participant in the **[schoolwide program/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 moment to complete this questionnaire. Your feedback will be used to improve parent and family engagement 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? For SWP: Were you notified that your school is a schoolwide program?	☐	☐
2. Did you receive a copy of the school Parent and Family Engagement Policy?	☐	☐
3. Did you talk about the School-Family Compact with the teacher?	☐	☐
4. Have you been 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, homework completion, etc.)?	☐	☐
7. Have you been asked how the school could improve the parent and family engagement program?	☐	☐
8. Were you asked to help design the school's Parent and Family Engagement 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?	☐	☐

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

Newspaper	School newsletter	Your child	Title I teacher
Principal	Classroom teacher	Other parents	Other (explain on back)
	Website	Email	

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

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

Appendix M — Annual Parent and Family Engagement Evaluation (2)

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 SWP or TAS. This sample has combined issues for both programs.

Dear Parents:

Your child has been a participant in the **[schoolwide program/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 moment to complete this questionnaire. Your feedback will be used to improve parent and family engagement 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. 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-family compact.	☐	☐
4. I was invited to attend the meeting to work on/revise the school-family 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 and Family Engagement Policy.	☐	☐
8. My child felt comfortable attending this school.	☐	☐
9. Meetings were held at a convenient time of day.	☐	☐
10. Working in the science lab has helped 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 had 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 and family engagement program at the school. Thanks for your time and participation.

Appendix N — Effective School Parent and Family Engagement Policy Checklist

Effective School Parent and Family Engagement Policy Checklist	
• The policy must be reviewed annually by the school to determine that it meets parent and family engagement requirements outlined in Section 1114(b)(2) of the Every Student Succeeds Act (ESSA).	☐
• The policy must 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.	☐
• The school's written policy must describe specifically how the school will complete the requirements listed below.	☐
Hold an annual meeting to explain the Title I program to parents	
• The policy states than an annual meeting will be held to inform parents of the school's participation in the Title I program and to explain the requirements of the program and their right to be involved.	☐
Encourage parent and family engagement by offering a flexible number of meetings	
• The policy states that parent meetings, including parent conferences, will be held at different times during the day.	☐
• The policy states that Title I funds may be used to pay reasonable and necessary expenses associated with parent and family engagement activities, including transportation, childcare, or home visit expenses to enable parents to participate in school-related meetings and training sessions.	☐
Involve parents in the planning, review, and improvement of the parent and family engagement programs	
• The policy describes how parents will be involved in the printing, review, and improvement of the school's Parent and Family Engagement Policy.	☐
• The policy describes how parents will be involved in the planning, review, and improvement of the school's Title I program.	☐
• The policy describes how the school involves parents in the joint development of the Schoolwide Program Plan under ESSA Section 1114. *Applies only to Title I schools operating a Schoolwide Program.* ○ 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.	☐
• The policy states that the school will provide, if requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible.	☐
• The policy states that a school-family compact was jointly developed with parents and the compact outlines how parents, the entire school staff, and students will share in the responsibility for improved student achievement.	☐
Provide parents of participating Title I children	
• The policy describes how the school will provide parents of participating children with timely information about the Title I program.	☐
• The policy describes how the school will provide parents of participating children with a description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet.	☐
• The policy describes how the school will provide assistance to parents in understanding the State's academic content standards and student achievement standards, local academic assessments and how to monitor a child's progress and work with teachers to improve the achievement of their children.	☐
• The policy describes how the school provides materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate, to foster parent and family engagement.	☐
• The policy describes how the school provides additional opportunities for parents to offer suggestions and to participate in decisions relating to the education of their children.	☐

Appendix O — Effective School-Family Compact Checklist

Effective School-Family Compact Checklist

Compact Requirements described in the Every Student Succeeds Act (ESSA) Section 1116(d) and suggestions building an effective compact.

Responsibilities of the School

Explain district and school goals to meet student academic achievement standards. ☐

- Align the actions of the compact with the goals of the CSIP.
- Create specific goals based on achievement data.

Describe teachers' responsibility for supporting student learning and providing high quality curriculum and instruction. ☐

- Provide details on how teachers will help families understand what children are learning and doing in class.
- Be specific in how teachers will support parent participation at each grade level.

Responsibilities of the Family

Describe parents' responsibility for supporting student learning. ☐

- Provide connections for families related to what students are doing in class.
- Work with families in developing learning strategies and activities which can then be easily implemented at home on a regular basis.
- Maintain a dialogue with families by encouraging questions, suggestions, and feedback regarding the Title I program.

Responsibilities of the Student

Describe students' responsibility for their learning. ☐

- Provide real-life connections for students to what they are learning in class.
- Work with families to create specific, age-appropriate responsibilities for each grade level.
- Encourage students to share what they are learning in class with their families.
- Get input from students! Ask students how they want their teachers and families to support them.

School-Family Partnership

Describe opportunities to build partnerships with families (volunteer opportunities, observe classroom activities, and communicate with teachers). ☐

- Provide families and teachers with opportunities to develop skills for working together (class meetings, demonstration lessons, literacy conversations, etc.).
- Base activities on identified family needs.
- Schedule meetings at accessible locations and at different days and times

Jointly Developed

Describe how families are involved in developing and revising the compact. ☐

- Provide resources to help families to take part in the process (transportation, child care, etc.).
- Schedule meetings at accessible locations and at different days and times.

Communicating Student Progress

Describe multiple methods for regular teacher-family communication. ☐

- Incorporate discussing responsibilities listed in the compact during parent-teacher conferences.
- Support families and students through follow-up steps.
  - Keep families up-to-date on student progress
  - Provide families with tips on home learning
- Consult with families and determine what methods of communication work best for them.

Language and Format

The compact should be written in a language that is family-friendly. ☐

- Work with families to eliminate confusing terminology and ensure the compact clearly explains what should happen.
- Reach out to parents/staff with design skills to help create an attractive final product.
- Translate the compact (and other communications) into families' first languages.
- Shareholders are required to sign the compact.

Appendix P – Notification of Right to Request Teacher Qualifications

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

[date]

Dear Parent or Guardian:

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

Our district receives federal funds for Title I programs as a part of the Every Student Succeeds Act (ESSA). Under ESSA, you have the right to request information regarding the professional qualifications of your child's teacher(s). If you request this information, the district will provide you with the following:

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

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

Sincerely,

[Superintendent (or Designee)]

Appendix Q – Letter of Notification to Private Schools

Please customize this letter with district letterhead. Personalize to include district specific or additional 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 federal Title I statute 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 federal Title I statute 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 contact me at **[phone number]** or via email at **[email address]**.

Sincerely,

[Title I Coordinator]

Appendix R – Suggested Timeline for Consultation with Private School Officials *

MONTH	DISTRICT ACTIVITY
January	• Contact private school officials to set up consultation calendar for upcoming school year.
March/April	Initial consultation meeting: 34 C.F.R. 200.63 1. Determine data source for counting eligible students (identifying pool of eligible students is private school responsibility). 34 C.F.R. 200.78(a)(2) • Same poverty measure used to count public school students, which is usually free and reduced-price lunch; • Survey of private school parents asking for income data, address, and grade level of children from which the LEA must extrapolate these data; • Alternative poverty data such as scholarships, Temporary Aid to Needy Families (TANF), Medicaid, etc. **OR** • Decide through consultation to use proportionality 2. Identify multiple, educationally related criteria for choosing students (LEA responsibility). 34 C.F.R. 200.62(b) 3. Discuss academic goals of eligible students, appropriate assessments. 4. Solicit views on service delivery options, including "pooling" option. 5. Discuss districtwide instructional set-asides and administrative costs. 6. Determine services for parents and teachers of participating students. 7. Inform private school officials of their right to file a complaint to state education agency if they feel their views are not adequately considered. 8. Collect signed affirmation from private school officials.
May/June	• Determine equitable services amount based on number of eligible students and per-pupil allocations. 34 C.F.R. 200.64 • Identify students to participate. • Districts must provide opportunities for consultation with private school officials if program is modified or private school officials request continued discussions.
August	• Establish service start date (same as public school start date). • Finalize roster of participating students.
September	• Make needed changes to student roster. • Begin services.
October-June	• Regularly visits by LEA supervisor to Title I classrooms and regular communications with private school teachers and officials about student progress and program compliance. • Assess student progress and evaluate program effectiveness. Determine criteria for making program modifications when annual progress is not achieved. • Conduct professional development and parent and family engagement activities. 34 C.F.R. 200.65

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

Appendix S – Sample Consultation Agreement with Private School

Public School District Name:
Private School Name:

Section 1117(b)(1) of the Every Student Succeeds Act (ESSA) defines the topics required to be discussed during consultation between public and private school officials. These topics are:

☐ How the children's needs will be identified

☐ What services will be offered

☐ How, where, and by whom the services will be provided

☐ How the services will be academically assessed and how the results of that assessment will be used to improve those services

☐ The size and scope of the equitable services to be provided to the eligible private school children, the proportion of funds that is allocated under subsection (a)(4)(A) for such services, and how that proportion of funds is determined

☐ The method or sources of data that are used under subsection (c) and section 1113(c)(1) to determine the number of children from low-income families in participating school attendance areas who attend private schools

☐ How and when the agency will make decisions about the delivery of services to such children, 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

☐ How, if the agency disagrees with the views of the private school officials on the provision of services through a contract, the local educational agency will provide in writing to such private school officials an analysis of the reasons why the local education agency has chosen not to use a contractor

☐ Whether the agency shall provide services directly or through a separate government agency, consortium, entity, or third-party contractor

☐ Whether to provide equitable services to eligible private school children—

(i) by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(A) based on all the children from low-income families in a participating school attendance area who attend private schools or

(ii) in the agency's participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(A) based on the number of children from low-income families who attend private schools

☐ When, including the approximate time of day, services will be provided

☐ Whether to consolidate and use funds provided under subsection (a)(4) in coordination with eligible funds available for services to private school children under applicable programs, as defined in section 8501(b)(a) to provide services to eligible private school children participating in programs

If a local educational agency disagrees with the views of private school officials with respect to an issue described in paragraph (1) (i.e., the list of topics above), the local educational agency shall provide in writing to such private school officials the reasons why the local educational agency disagrees (Section 1117(b)(2).

Summary of the agreement reached between the public school district and private school officials based on the required consultation topics:

Private school officials must select from the three options below. Sign and date the form, then return to the public school district official with whom consultation occurred. Local educational agencies should scan and email signed forms to the ombudsman at kpso@education.ky.gov or mail to

Hiren Desai
300 Sower Blvd.
Frankfort, KY 40601
(502) 564-5130

☐ I affirm that timely and meaningful consultation required by Section 1117(b)(1) has occurred.

_____	_____	_____
Name of private school official (printed)	Signature of private school official	Date

☐ Timely and meaningful consultation has **not** occurred with public school district officials. Explanation (optional):

_____	_____	_____
Name of private school official (printed)	Signature of private school official	Date

☐ The program design discussed during consultation is **not** equitable with respect to eligible private school children. Explanation (optional):

_____	_____	_____
Name of private school official (printed)	Signature of private school official	Date

*If private school officials do not provide such affirmation within a reasonable period of time, the local educational agency shall forward the documentation that such consultation has, or attempts at such consultation have taken place to the state educational agency (Section 1117 (b)(5)).

Appendix T – 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	AGE/GRADE	NAME	AGE/GRADE

Infinite Campus resource for Title I Data Standards

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

SCHOOL: _____
TEACHER: _____
GRADE: _____

INSTRUCTIONAL AREA: Reading/Language Arts

Rank child in each column using the following ranking scale:

- 1 – very low
- 2 – low
- 3 – low average
- 4 – average
- 5 – above average

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

Other criteria such as diagnostic tests may be added.

Appendix V – 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 ranking scale:

- 1 – very low
- 2 – low
- 3 – low average
- 4 – average
- 5 – above average

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

Other criteria such as diagnostic tests may be added.

Appendix W – End of Year Title I Survey for Private School Teachers

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

[Date]

The Title I teacher(s) providing instructional service to [*insert name of school*] 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
   _____Receiving individualized help in a small group or one-on-one setting

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 X — Memorandum to Private Schools

Please customize this letter with district letterhead. Personalize to include district specific or additional 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 best meet the needs of your Title I participants.

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

Appendix Y — Neglected Facilities 2017-2018 School Year

DISTRICT	FACILITY NAME	FACILITY CASELOAD	ADDITIONAL NOTES
Barren County	Kinder Haven, Inc.	15	
	Spectrum Care Academy	11	
Beechwood Independent	Guardian Angel	40	Formerly: DCCH Center for Children and Families
Boone County	Children's Home of Northern Kentucky	19	
Bullitt County	Spring Meadows Children's Home	15	
Calloway County	Community Youth Services	4	
Campbell County	Holly Hill Children's Services	9	
Covington Independent	Homeward Bound Youth Shelter	10	
	Children's Home of Northern Kentucky	21	
Danville Independent	Sunrise Children's Services	29	
Elizabethtown Independent	Glen Dale Center	17	
Jefferson County	BelleWood	39	AKA: Uspiritus-Bellewood School
	Boys & Girls Haven School	37	
	Brooklawn	145	AKA: Uspiritus Brooklawn
	Home of the Innocents	176	2 locations
	Maryhurst, Inc.	81	AKA: Maryhurst Academy
	St. Joseph Children's Home	45	
Jessamine County	All God's Children	8	
Larue County	The Life Connection	36	
Murray Independent	Community Youth Services	8	
Paducah Independent	Community Youth Services	4	
Perry County	Buckhorn Children's Center Alternative School	38	
Pulaski County	Combs Residential Services, Inc.	2	
Wolfe County	Dessie Scott Children's Home	44	

Appendix Z – Personal Activity Report (PAR) Template

PERSONAL ACTIVITY REPORT (PAR)
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:**

Appendix AA — Sample Documentation for District Monitoring Checklist

District Monitoring Checklist — Sample Documentation	
LEA Report Card	
• Copy of the LEA Report Card.	☐
• Documents to support public dissemination of the report: news article containing the report or newsletter containing the report, cover letter for report, memo to schools, etc.	☐
LEA Plans	
• Meeting notices, meeting agendas, minutes of meetings, questionnaires, surveys, other relevant documents demonstrating shareholder consultation.	☐
• The LEA Plan (if most current version is not on file at KDE)	☐
Eligible Attendance Areas	
• Principal's monthly ADM report, School Food Service report/certification.	☐
• Copy of allocation procedures, Title I budgets for selected schools.	☐
• Recent expenditure report, budget report.	☐
• Meeting notice(s), meeting agendas/minutes/sign-in sheets for determining set-asides in consultation with shareholders.	☐
Schoolwide Programs	
• School Improvement Plan for selected schools.	☐
• Sample documents used in conducting needs assessment (e.g., test data, surveys, discipline reports, attendance reports, etc.) and summary of needs assessment.	☐
• School-level parent and family engagement plans describing how the school will implement the LEA Parent and Family Engagement Policy.	☐
• School-level parent and family engagement plans aligned with findings of the previous year evaluation and needs assessment.	☐
• Certification data.	☐
• Records of professional development activities/opportunities.	☐
• Records of recruitment and retention plans.	☐
• Evidence of annual public meeting.	☐
• Evidence of families included in meaningful, two-way communication.	☐
• Evidence of collaboration with community resources.	☐
• Documents demonstrating transition strategies between school and preschool programs and other transition plans as appropriate (e.g., between elementary and middle school programs, and middle and high school programs for helping students make the transitions from early childhood elementary or from elementary to middle, and middle to high school)	☐
• Samples of Personal Education Plans and/or Instructional Intervention Plans.	☐
• Samples of school communications to parents.	☐
Targeted Assistance Schools (if applicable)	
• Needs assessment data summary of needs.	☐
• A copy of selection procedures, multi-criteria scoring instrument, eligibility lists, participants list for all schools with targeted assistance programs.	☐

• Documentation used for selection process preschool to grade 2, eligibility, participants list, and records of meetings with Title I staff in participating schools and/or preschool programs.	☐
• Program narratives for all schools with TAS programs.	☐
• Copy of curriculum, instructional materials used in a project, research literature supporting selected programs.	☐
• Duty rosters for school staff and Title I teacher schedules.	☐
• Student portfolio samples including ongoing assessment data.	☐
• School-level parent and family engagement policy, records of meetings, training sessions, communication, and signed school-family compacts.	☐
Preschool (if applicable)	
• Rosters of enrolled students and students on the waiting list.	☐
• Process for enrollment including screening results and other selection criteria (teacher/parental input).	☐
• Rank order list of students who are failing or most at risk of failing to meet Kentucky's student academic achievement standards (for preschools within a TAS).	☐
• Copy of curriculum, daily classroom schedules, sample lesson plans, sample child assessment documentation.	☐
• Samples of school communication to families (primary language), records of meetings, training sessions, etc.	☐
• The Title I plan detailing how funds are used for both preschool and transitioning children into kindergarten.	☐
• A detailed budget indicating all sources of preschool funding.	☐
• State laws and/or local policies regarding required preschool programs and the amount of non-federal funding provided to meet those requirements.	☐
• A copy of the parent and family engagement policy and other documents dealing with parent and family engagement.	☐
• A copy of the process used for identifying eligible preschool students	☐
• Any documents involving the subcontracting of services (signed contracts, description of roles and responsibilities, etc.).	☐
• If funds are used to rent a private facility, maintain ample documentation that the space is necessary for the success of the program, the cost is reasonable, and that no other appropriate space is available.	☐
Parent and Family Engagement	
• LEA Parent and Family Engagement Policy.	☐
• Notice of parent meetings, agendas, minutes, sign-in sheets, records of parent comments to support dissemination procedures.	☐
• Title I budget reflecting required set-aside, distribution procedures of funds to participating schools, and samples of expenditures to date.	☐
• Meeting agendas, minutes, and sign-in sheets for parent advisory council.	☐
• Parent and Family Engagement Policy and School-Family Compact. Keep draft versions to indicate how parents influence school policy. Signed copies of compacts should be maintained at each school.	☐
• Sample school/class newsletters.	☐
• Copies of parent surveys and summary of results.	☐
• Fliers, sign-in sheets and summaries of Parent Nights.	☐
• Annual evaluation of the parent and family engagement program.	☐
• Parents' right-to-know	☐

• Documentation of translation services.	☐
• Log of phone calls, conferences, etc.	☐
Qualifications for Teachers and Paraeducators	
• LEA professional development plan.	☐
• Evidence of professional development aligned to needs and PD evaluations.	☐
• Samples of Individual Growth Plans, Professional Development Plans, etc.	☐
• Copies of right-to-know notifications.	☐
• Documentation that the paraeducator meets ESSA eligibility standards (transcripts, passing score on KPA)	☐
• Paraeducator's daily schedule and list of instructional and non-instructional duties	☐
Private School Participation	
• Letters to non-public schools, notice(s) of meetings, meeting agendas, meeting minutes for initial consultation on plan development.	☐
• Notice of meetings, meeting agendas, meeting minutes for participating private school ongoing consultations.	☐
• Private school/LEA set-asides, purchase orders from private schools, program description, FTE report, contracted services documents (if applicable).	☐
• Names and addresses of participating students	☐
• Proof of on-going consultation with private school officials (meeting agendas, minutes, sign-in sheets, walkthrough/observation notes, emails, etc.)	☐
• Proof of communication with parents of private school students (conferences, call log, meeting notes)	☐
• Copy of contract if a third party is being used to provide Title I services at private schools	☐
• Compact between the district and families of participating students	☐
• Documentation of professional development provided by the district	☐
• Assessments used to diagnose achievement of individual students	☐
• Letter/form showing private schools were contacted about participating in Title I	☐
• Teaching certificate/EPSB documentation of Title I teacher providing services	☐
• Proof that paraeducators providing services meet ESSA requirements	☐
• Dates and notes of parent and family engagement activities	☐
• Copy of procedures from Title IX, Part A, Uniform Provisions Subpart 1	☐
• Copy of resolution of complaints	☐
Fiscal Requirements	
• Copy of the LEA's policies/procedures for purchasing/procurement, fixed assets, and other internal control policies.	☐
• Time and Effort documentation (i.e., Personnel Activity Reports (PARs), Semi-annual certification).	☐
• List of payments for contracted services for all federal program funds.	☐
• Records of equipment inventory compliant with 2 C.F.R. Part 200.313 and 2 C.F.R. Part 200.439 (EDGAR) for items with a useful life greater than 1 year; records of inventory reconciliation; records of equipment disposition (if applicable).	☐
• Budget, purchase orders, cost allocation procedures (as appropriate) for preschool programs supported with Title I funds.	☐
• Documentation of the methodology for distributing state and local funds to schools.	☐

Local Institutions for Neglected and Delinquent Children	
• Annual survey of Children in Local Institutions for Neglected or Delinquent Children	☐
• Documentation of children attending the facility	☐
• Attendance data for children that have been in the facility for at least one day in October	☐
• Proof of consultation with institution officials regarding Title I services	☐

Homeless Children and Youth	
• Homeless Education posters displayed in schools and district office (download posters in English and Spanish from the National Center for Homeless Education)	☐
• Proof that the district has effectively communicated the existence of the homeless liaison (student handbook information, fliers, newspaper postings/articles, etc.)	☐
• Annual homeless count data	☐
• District policy on identifying homeless families	☐
• Sign-in sheets and minutes on related trainings	☐
• Proof that homeless children and their families receive education services for which they are eligible (information provided to families, referrals from FRYSC)	☐
• Documentation of transportation assistance	☐
• Written statement of school placement decision and the appeal rights	☐
• District enrollment policies	☐
• District set-aside in GMAP for homeless children and youth (including a description of the educational services provided).	☐

GLOSSARY OF TERMS AND ACRONYMS

125% Rule — A school or school attendance are whose student population is below 35% poverty may still be eligible for Title I funds. If using this rule, the district divides its total allocation per low-income child by the number of low-income children in the district. Then multiply this per-child amount by 125%. When applying this rule, the district completes this calculation *before* reserving any funds.

35% Rule — A school or school attendance area whose student population is at least 35% poverty is eligible for Title I funds. School attendance areas must be served in rank-order.

75% Rule — A school or school attendance area whose student population is at or above 75% poverty must be served in rank-order first when building eligibility of per-child amount allocations.

Community Eligibility Provision (CEP) — Section 104(a) of the Healthy, Hunger Free Kids Act of 2010 amended the National School Lunch Act to provide an alternative to household eligibility applications for free and reduced price meals in high poverty districts and schools. This alternative is referred to as the Community Eligibility Provision (CEP). The overall purpose of the CEP is to improve access to nutritious meals for students in high poverty areas by providing meals to all students "at no cost" to the students. Visit KDE's Title I, Part A and Community Eligibility Provision webpage to learn more.

Comprehensive Improvement Planning – School/district improvement efforts focus on student needs through a collaborative process involving all shareholders to establish and address priority needs, district funding, and closing achievement gaps between identified subgroups of students. To learn more and view tools for building an effective Comprehensive School Improvement Plan (CSIP) and Comprehensive District Improvement Plan (CDIP), visit KDE's Comprehensive Improvement Planning for Schools and Districts webpage.

Elementary and Secondary Education Act (ESEA) – ESEA, which was first enacted in 1965, is the principal federal law affecting K-12 education. *The Every Student Succeeds Act* is the most recent reauthorization of the ESEA.

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.

Fiscal Year (FY) — the period of time between July 1 and June 30 of any given year.

Grade Span — When an LEA opts to serve schools below 75% poverty, the LEA may choose to serve particular grade spans (such as K-5 or K-8) as long as the grade span is served in rank order.

Grant Management and Application Planning (GMAP) – the system used by Kentucky districts to maximize the use of their grant dollars from federal non-competitive programs. GMAP allows districts to apply for and manage grant applications. GMAP also provides monitoring, approval, and reporting functionality for KDE staff.

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

Limited English Proficient (LEP) – 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 Education 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.

Needs Assessment – (also referred to as a **comprehensive needs assessment**) the epicenter of the improvement plan from which all else revolves. The needs assessment should include rationale of why particular measures are chosen and provide a basis for the strategies and activities that will yield results. This document provides evidence (data, diagnostics, etc.) of the current state of the school/district as well as the determination of the desired state, and the ultimate improvement goals of the school/district. Purchases made with Title I, Part A funds should relate directly to the needs assessment.

Non-Public (NP) – nonpublic schools include both private schools and homeschools. More information and resources can be found on KDE's Non-Public Schools webpage.

Paraeducator – (also referred to as a **paraprofessional**) 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 parent and family engagement activities
- Provide support in a library or media center
- Act as a translator

Parent and Family Engagement – 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 engagement activities.

Per Pupil Amount (PPA) – the PPA determines the amount of funds generated by a school based on the number of low-income children.

Professional Development (PD) – 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.

State Educational Agency (SEA) – 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 –Title I, Part A provides assistance to improve the teaching and learning of children in high-poverty schools to enable those children to meet challenging State academic content and performance standards.